

Summary of TMBC Responses to TWBC Local Plan Regulation 18 (October 2019) compared with the Regulation 19 Local Plan (March 2021)

TMBC Reg 18 Response	TWBC Reg 19 Changes	Comment
<p>Taken from formal response of 16.10.19 (See Appendix 1 to this report)</p> <ul style="list-style-type: none"> • Proximity of strategic allocations close to borough boundary and south east Tonbridge – potential impact on local infrastructure; • T&M to be key partner in master planning discussions and planning for infrastructure including wider transport implications and flood risk mitigations; • Consider developer contributions for mitigations in T&M, if necessary; 	<ul style="list-style-type: none"> • New Secondary School site relocated to the east of Tudeley; • Local services at both strategic sites to cater for day to day needs of new growth; • New infrastructure and mitigation of impacts on existing facilities set out in IDP and master plans; • Viability study demonstrates funding of infrastructure is deliverable using developer contributions. • T&M attend Tunbridge Wells monthly Strategic Sites Working Group; to complement ongoing regular Duty to Cooperate meetings; separate meetings arranged with infrastructure providers as necessary; references to T&M included in relevant policies throughout the Local Plan. • IDP identifies improvements to Vauxhall Roundabout Increased capacity at A26/A2014/Pembury Road for £1m to be funded by developer contributions. 	<p>The Regulation 19 version of the Tunbridge Wells Local Plan has taken on board many of the comments and concerns raised by Tonbridge and Malling at the Regulation 18 stage.</p> <p>The Local Plan still seeks to meet all future needs for development within the Borough, but confirms that this is only possible with the contribution of the two strategic sites at Tudeley and Paddock Wood.</p>

<ul style="list-style-type: none"> • Importance of on-site health care provision for strategic sites at Tudeley and Paddock Wood; • Tonbridge Cottage Hospital to be considered in discussions with CCG over Local Care Hubs; • Relocation of proposed Secondary School; • Impact of new development on rail service capacity, car parking at Tonbridge. 	<ul style="list-style-type: none"> • Also £1.5m identified for increased capacity at A26 Woodgate Way/ B2017 Tudeley Road roundabout (just outside the borough) • Policies amended to identify health facilities for both Tudeley and Paddock Wood. • Unsure if Local Care Hubs have been discussed to date. • Has been relocated. • Discussions with Network Rail have concluded that there are no capacity issues arising from the proposed growth in the TW Local Plan. • Opportunity for a new station at Tudeley has been included in the Local Plan, but not anticipated/required for this Local Plan. 	
<p>Issues Raised in the PTAB Report of 2.10.19</p>		
<p><u>Policy STR/CA1 (Strategy for Capel)</u> <u>Policy AL/CA1 (Tudeley Village)</u></p> <p>New settlement of up to 2,850 new dwellings with associated infrastructure, comprehensively master planned using Garden Communities principles.</p> <p>Issues for T&M and comments:</p>	<p><u>Policies STR/SS1-3 (Strategic Site Policies)</u> <u>Policy STR/CA1 (Strategy for Capel)</u></p> <p>New settlement of up to 2,800 new dwellings (2,100 to be delivered within the plan period) with associated infrastructure, comprehensively master planned using Garden Communities principles.</p>	<p>These policies have been updated and amended in response to comments received at Regulation 18 and in the light of the further evidence and work carried out since 2019.</p>

<ul style="list-style-type: none"> • To ensure adequate infrastructure is planned and delivered to minimise pressure on capacity/services in Tonbridge <ul style="list-style-type: none"> ○ concern that appropriate mitigation may be of such a scale that it becomes unfeasible; ○ ensure adequate health care facilities are provided as part of the proposal; • Transport links to the west towards Tonbridge should be improved; • Location of the proposed 6 Form Entry secondary school close to the boundary with T&M and South East Tonbridge was raised as a concern; • Take account of the impact of the development on the setting of Hadlow Tower; 	<ul style="list-style-type: none"> • The IDP sets out the necessary infrastructure and mitigation, when it should be provided, and estimate of cost and how it will be funded. Most of the requirements arising from the strategic sites will be funded by developer contributions. The Viability Study concludes that this is deliverable/feasible. • The IDP sets out the details of significant improvements to the local highway network (including two roundabouts in T&M); bus routes and Active Travel. • The location of the Secondary school has been moved to the east of the new settlement at Tudeley to better serve the planned growth at Tudeley and Paddock Wood. The policy for the secondary school (AL/CA2) has been deleted and the proposal incorporated into the main policy for the new settlement (STR/SS3). • The revised Policy STR/SS3 recognises the importance of good design stating that: ‘consideration should be given to the key landscape characteristics, views, and the setting of the High Weald Area of Outstanding Natural Beauty; and that 	<ul style="list-style-type: none"> • Since 2019 TWBC have commissioned consultants to master plan the strategic sites and prepared an evidence base (including a whole plan viability study, transport assessments and an Infrastructure Delivery Plan (IDP)) and established a Strategic Sites Working Group of promoters, land owners, community groups, infrastructure providers and neighbouring Local Authorities (including T&M). • The master planning of the new settlement at Tudeley includes local facilities that will cater for day to day needs thus reducing the need to travel further afield. • This is in recognition of the concerns raised by T&M at Reg18 and also to overcome some operational concerns regarding the former site raised by Kent Education. The new location is close to the existing primary school at Five Oak Green (which will also be expanded). • Policy STR/SS3 also states that: ‘The development will be delivered through the production of a Framework Masterplan Supplementary Planning Document (SPD) to guide development in respect of the garden settlement principles and creation of a new community at Tudeley Village.
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<ul style="list-style-type: none"> • Exceptional circumstances for removing Green Belt designations and major development in the setting of the High Weald AONB; 	<p>particular respect should be given to the setting of heritage assets’.</p> <ul style="list-style-type: none"> • These are set out in the Development Strategy Topic Paper. 	<p>The SPD will set out broad principles to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site and will set out the phasing for delivery of the key elements and associated infrastructure. The SPD will need to ensure all elements of the proposals are considered comprehensively, following a masterplan approach. Proposals for the piecemeal development of individual sites/elements within the settlement without the comprehensive masterplan approach will not be supported.</p> <p>Planning applications for development within this area should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application. Applicants will be expected to liaise with Kent County Council, adjacent local planning authorities (Tonbridge & Malling and Maidstone Borough Councils) and other consultees in the provision of infrastructure associated with the new settlement.’</p> <ul style="list-style-type: none"> • The Local Plan document is written in a way that assumes the exceptional circumstances have been accepted as part of the examination process.
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<ul style="list-style-type: none"> Refer to ongoing commitment to work with T&M in addressing these issues in the Local Plan. 	<ul style="list-style-type: none"> Numerous references have been added to the importance of ongoing involvement with key stakeholders (including T&M), consultees and neighbouring authorities. 	<ul style="list-style-type: none"> Once the Local Plan is adopted more detailed master planning or the two strategic sites will continue. These will be adopted as Supplementary Planning Documents in due course.
<p><u>Policy AL/CA2 (New Secondary School)</u></p> <p>Proposals for a new 6 form entry secondary school located north of Tudeley Lane and adjacent to the borough boundary in close proximity to the built confines of south east Tonbridge.</p> <p>Issues include:</p> <ul style="list-style-type: none"> Trip generation/impact on the local highway network in an area relatively remote from Tonbridge Station, other schools in Tonbridge and currently poorly served by public transport. Implications for highway capacity in Tonbridge in light of development planned in Tonbridge Local Plan. Addressing site constraints including access across the railway line and incorporating the ancient woodland. 	<p>Policy deleted.</p> <ul style="list-style-type: none"> Trip generation to the new school will still be modelled and mitigated, but any direct impact on Tonbridge will be effectively removed by relocating the school 3-4 miles further east. See above. No longer an issue. 	<p>The location of the new school has been relocated to the east of the new settlement at Tudeley and is now covered by Policy STR/SS3.</p>
<p><u>Policy STR/PW1 (Strategy for Paddock Wood)</u> <u>Policy AL/PW1</u></p>	<p><u>Policy STR/SS1 (The strategy for Paddock Wood including land in the east of Capel Parish)</u> <u>Policy STR/PW1</u></p>	

<p>Proposals include provision for 4,000 new dwellings, an off-line improvement to the A228 at Colts Hill (by-pass), highway links to the west towards the new settlement at Tudeley, new primary schools and expansion of Mascalls secondary school and improved flood defences to be master planned in advance of any planning applications, using garden communities' principles.</p> <p>Issues include:</p> <ul style="list-style-type: none"> • Ensuring the associated infrastructure is properly planned and implemented so that there is no pressure on facilities in Tonbridge. • Improving transport links to the west towards Tonbridge. • Managing the potential impacts of these proposals on the future capacity of rail services to London. 	<p>Proposals include provision for between 3,490 and 3,590 new dwellings, an on and off line improvement to the A228 at Colts Hill, a new by-pass for Five Oak Green and link road to the A228, 3 new neighbourhood centres, 2 new primary schools, a sports and leisure hub including a 25m pool, a new health centre, 3 Gypsy/Traveller pitches, additional employment land, a wetland park, extensive cycling and walking links, 40% affordable housing and at least one sheltered housing and one extra care housing scheme.</p> <ul style="list-style-type: none"> • The revised policy, IDP and master plan work all seek to achieve this. • These are set out in the IDP (see: Pre-Submission Supporting Documents (tunbridgewells.gov.uk)) • TWBC have worked closely with Network Rail in the preparation of this Plan. Network Rail have confirmed that the proposed growth in Tunbridge Wells Borough dose not require specific rail capacity interventions. 	<p>Both Strategic site policies (Paddock Wood and Tudeley) include a requirement that prior to any planning application that applicants prepare a Drainage Strategy to demonstrate that any development proposed will not exacerbate flooding elsewhere.</p> <p>This is part of a package of measures designed to deliver the Local Plan aim of achieving betterment in terms of flood risk as a result of these developments.</p> <p>Normally, applicants and developers are only required to mitigate the impact of their own development, but the concept of betterment goes further to improve the situation for the wider (established) community.</p>
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<ul style="list-style-type: none"> Understanding the potential impacts of a new Colts Hill bypass on the wider highway network. 	<ul style="list-style-type: none"> The Transport Assessment accompanying the Local Plan models a study area that includes all of the built up area of Tonbridge. (see: Pre-Submission Supporting Documents (tunbridgewells.gov.uk)) 	<ul style="list-style-type: none"> In addition to improvements to local highways and junctions, new and improved bus routes and promoting sustainable transport alternatives (walking and cycling), the strategic sites now include local facilities to meet the day to day needs of residents. These discussions have also recognised that there will be long term changes to commuting habits as a result of increased home working/different commuting times. The Transport Assessment (March 2021) has been prepared by the consultants SWECO.
<p><u>Policy AL/SO3 (Land at Mabledon and Nightingale)</u></p> <p>The site at Mabledon and Nightingale (east of the A26) is allocated for a mixed use development including up to 120 residential properties.</p> <p>Issues include:</p> <ul style="list-style-type: none"> The site is not proposed for removal from the Green Belt designation in the Local Plan and therefore very special circumstances will have to be made to enable these developments to take place. As major developments in the AONB, exceptional circumstances will also have to be successfully demonstrated. 	<p>Policy deleted.</p> <ul style="list-style-type: none"> No longer applicable 	<p>This site has been removed from the Local Plan.</p> <p>No further action.</p>

<p><u>Policy AL/SO4 (Land at Mabledon House)</u></p> <p>Mabledon House (west of the A26) is proposed for a new luxury hotel of up to 200 rooms. As this site straddles the borough boundary Policy AL/SO4 stresses that the ‘successful implementation of this policy is dependent on the support and cooperation of TMBC’.</p> <p>Issues include:</p> <ul style="list-style-type: none"> • The site is not proposed for removal from the Green Belt designation in the Local Plan and therefore very special circumstances will have to be made to enable these developments to take place. As major developments in the AONB, exceptional circumstances will also have to be successfully demonstrated. • The site at Mabledon House will require a joint approach if development is proposed in Tonbridge and Malling. 	<p><u>Policy AL/SO2 (Land at Mabledon House)</u></p> <p>This policy is largely unchanged from the Regulation 18 version.</p> <p>The Policy now includes a criteria to explore opportunities to contribute to the provision of a cycle link to Royal Tunbridge Wells, Southborough, and Tonbridge and, if feasible, to be provided.</p> <ul style="list-style-type: none"> • The supporting text to the Policy refers to evidence that there is a lack of this kind of accommodation in West Kent. This proposal could address this and may form the basis of the very special circumstances case. • The Policy in the Tunbridge Wells Local Plan only covers that part of the site in the Borough of Tunbridge Wells, but the site straddles the boundary, which may require a joint planning application should proposals come forward in the future. 	<p>Tonbridge and Malling also has a lack of this type of hotel accommodation and would welcome working with the landowner/applicant and Tunbridge Wells Borough Council to consider any future development proposals on this cross boundary site.</p>
<p><u>Policy AL/RTW12 (Land adjacent to Longfield Road Tunbridge Wells)</u></p> <p>Site designated for employment uses for up to 80,000 sqm (net) floorspace. It is located close to the A21 junction with North Farm.</p>	<p><u>Policy AL/RTW17 (Land adjacent to Longfield Road Tunbridge Wells)</u></p> <p>The policy is largely unchanged from the Regulation 18 version of the Local Plan, but the accompanying text acknowledges that there is</p>	<p>The resolution to grant planning permission and the views of the Highway Authorities mean that this allocation is more likely to be deliverable than it was at the Regulation 18 stage.</p>

<p>Issues include:</p> <ul style="list-style-type: none"> • Potential future employment opportunities for Tonbridge and Malling residents. • Significant trip generation, consequent impact on the capacity of the A21 and possible competitor for Tonbridge industrial area. • The site is located within the Green Belt, but the Local Plan does not seek to make exceptional circumstances for removing the designation, relying instead on very special circumstances for development within the Green Belt. This raises a question over deliverability. 	<p>now a resolution to grant planning permission for a 74,000 sqm employment use on this site.</p> <ul style="list-style-type: none"> • As before. • Highways England and KCC Highways and Transportation have considered the impact of the development, including on potential cross boundary implications, and support the application. • The resolution to grant planning permission appears to have accepted the very special circumstances in this case. 	
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