Local Plan Consultation
Planning Policy
Tunbridge Wells Borough Council
Town Hall
Civic Way
Royal Tunbridge Wells
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15th November 2019

To the Local Plan Consultation Team

RESPONSE BY CRANBROOK AND SISSINGHURST PARISH COUNCIL TO THE LOCAL PLAN (REG 18) CONSULTATION

This submission represents the considered response of Cranbrook and Sissinghurst Parish Council to the consultation on the Tunbridge Wells Local Plan (Reg 18).

Cranbrook and Sissinghurst Parish Council welcomes the opportunity to contribute to the formulation of an important stage in the Local Plan process, creating a statutory plan that will guide the future of the whole Borough. The ideas and policies within the Tunbridge Wells Local Plan will have a direct impact on the future of Cranbrook and Sissinghurst and therefore the Parish Council is keen to be as fully involved as it can be in order to shape and influence the new TWBC Local Plan in a constructive and useful way.

While it is clear that a lot of effort has gone into the creation of the draft TWBC Local Plan, there are some fundamental issues that prevent Cranbrook and Sissinghurst Parish Council offering its full support for the document as it currently stands.

There are serious concerns about the scale, pace and location of new development being proposed for Cranbrook and Sissinghurst, as well as a lack of support for the neighbourhood planning process.

This submission comprises six sections, as follows:

A. Summary of key objections to the Local Plan (Reg 18) Consultation
B. Line by line response to Policy STR/CRS 1 strategy for Cranbrook and Sissinghurst
C. Response to site specific allocation across the Parish as contained in the draft TWBC Local Plan
D. Response by Cranbrook and Sissinghurst Neighbourhood Development Plan to key sections of the draft TWBC Local Plan
E. Response to the “distribution of development” topic paper for draft TWBC Local Plan
F. Concerns over the consultation exhibition programme
Much of the development in the TWBC Local Plan as proposed for the Parish is at odds with the aims, objectives and planning policies in the emerging draft Cranbrook and Sissinghurst NDP. A dedicated team of local residents has been working with the community to develop this draft since early 2017. A key piece of early evidence was the production of a parish Housing Needs Assessment identifying a need for 610 houses. This figure was confirmed to TWBC as deliverable, whilst honouring the expressed wish of the community for small developments.

There has been widespread support within the Parish for the neighbourhood planning process that the group has created. The publication of a draft TWBC Local Plan that fails to acknowledge the site assessment evidence work carried out by the NDP undermines confidence in the process adopted by TWBC.

More than ever, local communities want and need to be involved in the design and planning of the places they live, learn and work in. We therefore urge the team at TWBC to rethink its approach to the preparation and content of the Local Plan, in order to bring together communities across the Borough to make the places we all want for the future.

Clearer and stronger definitions of the role of the Local Plan and that of neighbourhood plans across the Borough are required. This will give Parish Councils the space within the system to develop and deliver effective spatial plans for their neighbourhoods.

We remain available to engage in further discussions and conversations with you about any of the points we raise in this submission.

Yours sincerely

[Signature]

Cllr. Kim Fletcher

Chairman Cranbrook & Sissinghurst Parish Council
A. SUMMARY OF KEY OBJECTIONS TO THE LOCAL PLAN (REG 18) CONSULTATION

Failure to conform to key aspects of the National Planning Policy Framework (2019)

- **Object:** There appears to be a failure by TWBC to properly consider paragraph 11b)i and 11b)ii of the NPPF. These sections allow a discounting of the objectively assessed needs (OAN) housing figures if an area contains protected areas or assets of importance that provide a strong reason for restricting the overall scale, type or distribution of development. Significant parts of the Borough comprise nationally protected landscape, Area of Outstanding Natural Beauty (AONB) yet there appears to have been no effort to reduce the scale of housing and development across the Borough under the provisions of paragraph 11 of the NPPF.

    Indeed, the reverse appears to be true as TWBC has decided to increase the OAN figure by 900 houses Borough wide. How can this be considered reasonable given the AONB landscape that is so significant in the area?

- **Object:** The failure to consider NPPF paragraph 172. This sets out why great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight. The scale and extent of development within these designated areas should be limited and planning permission should be refused for major development other than in exceptional circumstances. There appears to be no evidence that TWBC has followed this important national policy by maximising the sites within and around Tunbridge Wells, Southborough and Paddock Wood before allocating further within the AONB, in and around Cranbrook.

Failure to effectively engage and consult the resident population

- **Object:** There was a very limited on-site engagement process during the consultation period, which we feel was an inadequate amount of time for such a large geographical area, the level of proposed development and to discuss other very complex matters.

- **Object:** Difficulties in accessing the online consultation portal.

- **Object:** A complex consultation form to complete that many residents have found confusing. This was belatedly recognised by TWBC when it extended its deadline for comments by two weeks.
Inappropriate Distribution of Development Policy

- **Object:** There appears to be a failure to consider the results of a previous consultation where only 8% of respondents supported the “distribution of development policy” now being proposed by the draft TWBC Local Plan, as recorded in paragraph 5.5 on page 12 of the “Distribution of Development” background paper.

- **Object:** There appears to be a fundamental mistake to categorise Cranbrook as an “urban area” in the TWBC draft Local Plan. This in turn triggers the implementation of urban strategic planning policies of the same type being applied to Tunbridge Wells, Southborough and Paddock Wood, but to a much smaller settlement, sensitive to change and located deep within in the AONB.

- **Object:** The Parish Council also has serious concerns about the scale, pace and location of new development being proposed for the Parish, much of which is at odds with the aims, objectives and planning policies in the emerging Neighbourhood Plan for Cranbrook and Sissinghurst.

- **Object:** The Landscape Sensitivity Report, commissioned by TWBC in 2017, concluded that there are significant areas of “high” landscape sensitivity across the Parish, yet significant numbers of new homes are now being proposed. Every allocated area in the Parish, bar one, was described as having “high” landscape sensitivity. How can the conclusions of this report be squared with the content of the draft TWBC Local Plan?

Failure to properly and meaningfully engage with neighbourhood planning

- **Object:** There is a lack of any coordinated support through the draft TWBC Local Plan for the neighbourhood planning process as a means of delivering the aims and aspirations of the TWBC draft Local Plan on the ground.

Failure to develop a coordinated approach

- **Object:** The draft TWBC Local Plan does not appear to consider the wider impact on Cranbrook and Sissinghurst of development in neighbouring areas such as over 600 new homes in Hawkhurst and 6,180 homes in nearby Rother District. Meanwhile, the draft TWBC Local Plan proposes 1,751 new homes to the east of the Borough, with the majority of economic development to be around Tunbridge Wells, in the west. This is not a sustainable strategy.
B. LINE BY LINE RESPONSE TO POLICY STR/CRS 1 STRATEGY FOR CRANBROOK AND SISSINGHURST PARISH

At the Parish of Cranbrook and Sissinghurst, as defined on the draft Policies Map, proposals shall accord with the following requirements:

1. Approximately 718-803 new dwellings will be delivered on nine sites (*) allocated in this Local Plan in this plan period (Policies AL/CRS 1-9) and approximately 100-115 new dwellings on five sites in Sissinghurst (Policies AL/CRS 12-16) in this Local Plan in the plan period. (*) Of these sites, the following already have planning permission: AL/CRS 4 for 36 dwellings and CRS 8 for 28 dwellings;

Cranbrook and Sissinghurst PC Response > The overwhelming feeling within the community is that the numbers are far too high for a small town and village like Cranbrook and Sissinghurst. The draft TWBC LP covers the period 2016 – 2036 yet the numbers do not take into account any building carried out across the Parish in the last three years.

The numbers also do not recognise the Housing Needs Assessment (HNA) carried out by an accredited and internationally recognised professional consultancy on behalf of the emerging neighbourhood plan, which identified a need for no more than 610 houses. This HNA figure was shared with TWBC Local Plan team.

Therefore, we can only presume that the proposed number of new dwellings for the Parish is based upon land put forward through the call-for-sites process, and not on the needs of the Parish. This is supported by the comments made by Cllr Alan McDermott during the Parish Council meeting of 9th August 2019 – “In response to Cllr. Beck, Cllr. McDermott advised that if no one had put any sites forward then it would have been unlikely that we would have been allocated any new homes.”

2. Additional housing may be delivered through the redevelopment of appropriate sites and other windfall development in accordance with Policy STR 1:

Cranbrook and Sissinghurst PC Response > With the number of potential farmstead type developments within the area, the cumulative impact on the Parish could be significant, with limited opportunities to establish control over developments, or recognise the local need for truly affordable housing. There are already a number of proposals for “the magic nine” and therefore a more realistic threshold figure for windfall development would normally be five or six homes.

3. All development proposals will be required to establish the impact of the proposed development upon Hawkhurst and the Filmwell crossroads (junction of A21 and A268):

Cranbrook and Sissinghurst PC Response > This requirement cannot be proven or disproven and, therefore, cannot be verified – what does “establish the impact” mean in practice? It appears to show the unfamiliarity of TWBC regarding the predominant direction of travel from the Parish. There is no recognition of the major traffic bottleneck...
at Goudhurst to the west, likely to be made much worse with the development proposed (see above), the subsequent impact on the junction of the A21 at Lamberhurst, and the extra strain on capacity between this junction and Kippings Cross. Of equal importance is the fact that the majority of train journeys will commence at Staplehurst or Marden.

4. Where a site is within the AONB, it should be demonstrated that the proposal will make a positive contribution towards achieving the objectives of the most recent AONB Management Plan and show how relevant guidance from the AONB Joint Advisory Committee has been considered to meet the high standards required of the other policies in this Plan for the High Weald AONB landscape:

Cranbrook and Sissinghurst PC Response > A significant proportion of the Parish is within the AONB, including all the sites in Cranbrook, and just four of these are intended to provide nearly 700 dwellings. These large-scale developments are totally against the reasons for protection as afforded by the AONB designation and should provide an opportunity for TWBC to resist the numbers of dwellings imposed by government – see para. 11 b)i and b)ii of the NPPF. The fact the numbers have not been discounted, diminishes any faith that the local community may have had that TWBC development management team will enforce the high standard required by building in the AONB at the time planning permission is sought.

5. Sites outside the AONB but within the High Weald National Character Area, or close to the boundary of the designated AONB landscape, will have similar characteristics and are likely to contribute to the setting of the designated landscape. The AONB Management Plan and any supporting guidance will be a material consideration for these sites:

Cranbrook and Sissinghurst PC Response > The community in Sissinghurst will take a lot of convincing that this is the case. Given the apparent lack of attention and concern being paid to land that actually is within the AONB, there is little faith within Sissinghurst that land that is technically outside but shares the same characteristics will receive any particular consideration from the policy or development management teams in TWBC.

6. All development proposals will ensure that landscape gaps between individual areas of the Parish are retained to prevent coalescence of development:

Cranbrook and Sissinghurst PC Response > There are major concerns that so much green space will be lost that coalescence is inevitable: witness Corn Hall/Brick Kiln Farm/Turnden, Wilsley Farm, and Mill Lane. Unless there is a spatial plan that clearly demonstrates how this coalescence can be prevented, then there is no faith this aspect of the policy can be implemented.

7. Maintenance and enhancement of, and/or linkages to, public rights of way or the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibillity: to include contributions towards the proposed Bedgebury to Sissinghurst cycle path route:

Cranbrook and Sissinghurst PC Response > We can support this as a minimum requirement but much more needs to be done to support a more local cycle network of routes for short distance utility trips – e.g. between where people live, where they go to school, where they shop and so on. Without convenient and direct cycle infrastructure for trips of 2-3 kms, making people feel safe when they ride, and encouraging them to
switch travel modes, there is no hope of meeting climate change targets, reducing congestion or meeting health and wellbeing targets for the Borough.

Furthermore, the type and range of access and movement policies contained within the emerging Cranbrook and Sissinghurst NDP need to be considered by this strategic Local Plan policy. These include policies designed to ensure effective traffic-calming, the routing of HGVs and mitigating the impact of through traffic on heritage areas. None of these issues appear to be addressed by policy STR/CRS1. Such infrastructure requirements demand master-planning across all sites at the outline planning stage.

8. The following public car parks within Cranbrook and Sissinghurst, and as defined on the draft Policies Map, will also be retained in accordance with Policy TP 4: Public Car Parks:
   - Tanyard
   - The Regal/Co-Op
   - Jockey Lane

   Cranbrook and Sissinghurst PC Response > We support this, however it must be recognised that parking demand will increase as a result of the proposed high levels of development. Additional sites, such as the Rugby Club, should be investigated thoroughly. See earlier comment about the need to provide viable alternatives to the car if this issue is to be fully reconciled.

9. Provision of allotments, 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;

   Cranbrook and Sissinghurst PC Response > This aspect of the policy is supported, and will be expected to be considered early in the planning process.

10. Provision of a framework for a positive heritage strategy, including enhancements in accordance with the NPPF and adherence to Policy STR 8;

    Cranbrook and Sissinghurst PC Response > What precisely does this mean? Greater detail required. At the very least, there is resistance to the redrawing of the limits to built development boundaries.

11. Where necessary, undertaking a rapid Conservation Area appraisal for those absent or out of date.

    Cranbrook and Sissinghurst PC Response > This aspect of the policy is supported.

It is expected that contributions will be required towards the following if necessary, to mitigate the impact of the development:

a. Primary and secondary education;

    Cranbrook and Sissinghurst PC Response > Too vague and more detail is required.
b. Health and medical facilities; the three existing medical practices to be combined into one practice. Provision of land and new premises to deliver one GP practice and associated services:

**Cranbrook and Sissinghurst PC Response** > This merely reflects what is currently being proposed for Cranbrook, but there is no recognition that an expanded Sissinghurst will require its own medical facilities. Centralising medical facilities means more car journeys, and greater parking issues. This requires a rethink.

c. New community centre;

**Cranbrook and Sissinghurst PC Response** > This aspect of the policy is supported for Cranbrook only. See separate proposal for St George’s Hall, Sissinghurst.

d. The provision of buildings and spaces to provide cultural infrastructure;

**Cranbrook and Sissinghurst PC Response** > Too vague and more detail is required.

e. The provision of allotments, amenity/natural green space, parks, and recreation grounds, children’s play space and youth play space to include improvements to the cricket pavilion, improvements to the Tomlin Ground (Cranbrook Rugby Club), including to the changing rooms and club house, improvements to pitches at King George Field in Sissinghurst, including converting adult pitches to junior pitches;

**Cranbrook and Sissinghurst PC Response** > This is confusing. It barely seems to recognise the different needs of different parts of the Parish, and seems to muddle them all together. This is indicative of the apparent lack of understanding demonstrated by TWBC towards this Parish. New facilities will be required in proximity to development and also at the activity centres; the Planning Department should demand their inclusion at the pre-planning stage. There is also no mention of Cranbrook Football Club, and our hope to return it to the town.

f. Extending the Crane Valley public access route westwards and eastwards with consideration for biodiversity and ancient woodland;

**Cranbrook and Sissinghurst PC Response** > This aspect of the policy is supported.

g. A feasibility study to investigate the potential of creating pedestrian and cycle route between the settlements in the Parish, building upon existing footways and Public Rights of Ways; to include contributions towards the proposed utility and leisure cycling routes within the Borough Cycling Strategy and the proposed Bedegbury to Sissinghurst cycle path route:
Cranbrook and Sissinghurst PC Response > Who commissions and pays for this study? What happens next? Why do we need a feasibility study when we already know we want pedestrian/cycle access from Bedebury to Sissinghurst Castle?

h. A replacement of St George’s Hall (Sissinghurst):

Cranbrook and Sissinghurst PC Response > This aspect of the policy is supported.

i. Provision of electric vehicle charging points and car share facilities in accordance with Policy TP 2: Transport Design and Accessibility:

Cranbrook and Sissinghurst PC Response > This aspect of the policy is supported.

j. Bus services, including contributions towards a feasibility study to investigate the potential of creating a Demand Responsive Bus service for the Parish and beyond;

Cranbrook and Sissinghurst PC Response > This aspect of the policy is supported.

k. Other mitigation measures identified through the pre-application process and planning application.

Cranbrook and Sissinghurst PC Response > This aspect of the policy is supported.

Any major development larger than approximately 100 residential units on greenfield windfall sites is expected to provide suitable employment floor space, to be discussed with the Local Planning Authority and Cranbrook and Sissinghurst Parish Council through pre-application discussions.

Cranbrook and Sissinghurst PC Response > This makes no sense at all. How can a site of around 100 homes ever be classified as windfall? Surely a windfall site is for less than 10 homes, the minimum threshold set for your site allocations work? In any event, this requires much more detail. Is the employment space supposed to be mixed within residential dwellings? What constitutes suitable employment? And should the approx. 100 number be set lower if we are to get any employment at all?
The Limits to Built Development around Cranbrook and Sissinghurst are defined on the draft Policies Map. It is noted that these now include the sites/part sites to be allocated at Policies AL/CRS 1, 2 (part), 3 (part), 5 (part), 8, 9 (part), 10-11, 12 (part), 13 (part), and 14, 15 and 16, but exclude AL/CRS 4 (open gap/landscape buffer between existing LBD and developable part of site allocation), 6 (no existing LBD at Hartley), 7, and 17 (safeguarded land). As above at Policy STR 10, a further/separate LBD is proposed at Sissinghurst around existing built development to the west of the settlement and incorporating proposed residential site allocations AL/CR 13 (part), CR 15 and CR 16, with an open landscape gap retained between the two LBDs.

Cranbrook and Sissinghurst PC Response > This cannot be supported, as it provides a precedent for continually extending the LBD to enable the creation of even more developments. The LBD issue in Sissinghurst is confused with policy EN6 not extending as far as it should within the Great Swifts Estate. This leaves sections of the village and its setting unnecessarily vulnerable to development. Furthermore, the AONB coverage should be extended up to Sissinghurst Castle to provide parity of protection for both Cranbrook and Sissinghurst.
C. RESPONSE TO SITE SPECIFIC ALLOCATION ACROSS THE PARISH AS CONTAINED IN THE DRAFT TWBC LOCAL PLAN

A considerable number of residents have contacted the Parish Council with their concerns over particular sites which we have attached as summary in a separate response. These bring to your attention the draft sites that are causing our parishioners most concern. We submit these on their behalf, so you are aware of where the focus lies at this time. We urge you to treat these concerns with the utmost seriousness, as they are borne from a familiarity with the sites that TWBC will not have.

However, The Parish Council is reserving judgement on all the allocated sites contained within the draft TWBC plan that lie within its boundaries, until such time that the following issues are satisfactorily resolved:

- **Development Assumptions and the NPPF**: We need to reach common ground on the assumptions behind the “distribution of development” paper and the interpretations placed upon provisions within the NPPF. These two issues are critical in setting off a chain of events that leads to the high numbers being proposed across the Parish, significantly at odds with our own HNA numbers, and therefore a range of sites needed to accommodate those high numbers, many of which we feel are unacceptable. To make comments on a site-by-site basis makes no sense until the driving forces behind those allocations are properly explained and, then, resolved to our satisfaction.

- **Landscape Sensitivity Report (LUC, 2017)**: This report concludes there are significant areas of “high” sensitivity across the Parish, yet significant numbers of new homes are proposed. How can the conclusions of this report be squared with the content of the draft TWBC Local Plan? Until such time there is confidence that TWBC takes its own reports seriously, we cannot comment on the individual sites.

- **Neighbourhood planning needs to be consulted**: The relationship between neighbourhood plans and the TWBC Local Plan needs to be better defined and the ability for neighbourhood plans to make direct allocations needs to be restored. This ability has effectively been removed by the publication of the draft TWBC Local Plan that contains allocated sites across the whole Borough.

- **Revision of strategic policies**: The strategic policies that relate to the Parish need to be revised and adjusted to meet our concerns, including STR/CRS 1 – see earlier in this submission – before we are in a position to comment on specific sites.

- **Improved engagement**: The process of engaging local communities with the Local Plan preparation needs to be much improved. We would suggest extra events and further, extended periods of consultation are needed, during which time TWBC can try to
better explain its assumptions and reasonings before there will be the level of acceptance needed about the individual sites being put forward.

Only when significant progress is made on all four of these issues, can the Parish consider a site-by-site response to the Local Plan draft allocations.
D. RESPONSE BY CRANBROOK AND SISSINGHURST NEIGHBOURHOOD DEVELOPMENT PLAN TO KEY SECTIONS OF THE DRAFT TWBC LOCAL PLAN

Neighbourhood Plans are the only part of the planning system that require consent through a local referendum. The Cranbrook and Sissinghurst NDP group has been a willing participant in the Local Plan process yet all its efforts to work constructively with TWBC to prepare a complementary planning document to the Local Plan (i.e. an NDP) have been rebuffed. The Parish is wondering what the future is for its emerging Neighbourhood Plan, now that fundamental decisions, such as the location and spatial distribution of housing has been taken away from it.

Furthermore, there is no view expressed within the draft TWBC Local Plan about the expectations for neighbourhood planning –what exactly does TWBC want them to do to complement the Local Plan? There is almost no guidance or direction within the draft TWBC Local Plan on this matter. This omission leads many to believe that neighbourhood planning is considered marginal at best (and irrelevant at worst) by the TWBC Local Plan team. If the team in TWBC genuinely consider NDPs to be a useful and practical part of the system, there would be clear expectations set out for them. There are not.

Over the last 18 months, repeated communication from the Parish to TWBC Local Plan team has made clear the wish of the Neighbourhood Plan group to make direct site allocations in the emerging NDP. We strongly believe that a Neighbourhood Plan that contains site allocations is the most effective way for the local community to “develop a shared vision” for this area and to “shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan” (para. 29, NPPF).

Yet the draft TWBC Local Plan, as published in September 2019, includes allocations for the whole Borough, including in those areas where Neighbourhood Plans are being prepared by Parish Councils. We see no logic for this approach, an approach that fundamentally undermines the spirit and principles of localism. The damage caused to local democracy by this approach is a major cause for concern. In such a controversial period for public engagement, Neighbourhood Plans may be one of the most democratic things going on right now and yet the wishes of local people on this matter are being ignored.

p.38, para 4.35: Statement that TWBC has actively engaged with NDP groups around site selection

We are aware that the process has involved TWBC asking the opinion of NDP groups about the sites it intends to include in the draft TWBC LP. But at no point in the process has there been an encouragement for site allocations to be made within NDPs themselves, which is what many NDP groups want to be able to do, including Cranbrook and Sissinghurst. Repeated communications have made it clear that the NDP for the Parish wanted to directly allocate land for development to give local people the maximum control over its future. Our ambition in this area has been frustrated by TWBC at every turn. Examples of this frustration
include failure to honour commitments to provide information, such as backup to ‘Call for Sites’, or providing copies of minutes of meetings.

**para 4.35 – 4.37: Statement about the level of agreement between the Council and Parish representatives about which sites form a set of draft site allocations for each Parish**

This process is not what the Localism Act describes. It is widely understood that NDPs should allow local communities to take meaningful decisions over the location of new homes. Yet the TWBC process deliberately frustrates this, by taking all such decisions on behalf of local communities. This is counter to the Localism Act.

Despite a request to TWBC first made in June 2018 to prepare a “Memorandum of Understanding”, to better define the relationship between the TWBC Local Plan and neighbourhood plans, none has been forthcoming. This has left many NDP groups, including Cranbrook and Sissinghurst, unsure how to proceed on key matters.

**p.59: para 4.72 – 4.79 Reference to the neighbourhood planning process**

This is largely a “cut and paste” from the regulations and does little to explain how TWBC sees the process of preparing an NDP should contribute to the delivery of sustainable development across the Borough.

**para 4.79: This states: “Notwithstanding the Council’s support for neighbourhood plans, in view of the fact that their progress is variable and outside the direct control of the Council, as well as the pressing requirement to address under-delivery of housing against identified need, the Draft Local Plan includes draft allocations for the whole of the borough”**

This approach and statement deliberately frustrates those NDP groups that have been willing and able to make direct site allocations through the NDP process for some time. Indeed, several NDP groups have been able to accelerate the delivery of new homes (when compared to the LP process) if only they had been given the information and required support from TWBC at the right time.

Almost all NDPs can be produced more quickly than a LP and are much more responsive to local concerns. But, rather than work with the parishes to create a strong pattern of advanced and/or made NDPs across the Borough, the approach taken is to include draft allocations for the whole of the Borough, thereby deliberately undermining many NDP groups.

**p.60, Policy STR 9: Neighbourhood Plan**

This policy is extremely weak in terms of describing what TWBC expects of an NDP. What should its focus be? Where and how can it complement the LP process? No information of
this type is included. Yet, it is already known that NDP groups that have wanted to engage in site selection and allocation have been actively and cynically denied this opportunity through the inclusion of draft allocations for the whole of the Borough. So what do TWBC want to see from an NDP in their Borough?
E. RESPONSE TO THE “DISTRIBUTION OF DEVELOPMENT” TOPIC PAPER FOR DRAFT TWBC LOCAL PLAN

The Parish Council firmly believe that the distribution of development assumptions that underpin the draft TWBC Local Plan strategy are wrong, as follows:

- Cranbrook is a small town and Sissinghurst a village. Neither can be described as an urban area.
- A large proportion of the Parish (62%) is within the AONB, a nationally protected landscape area.
- To place Cranbrook and Sissinghurst in the same category as the urban area of Tunbridge Wells is clearly the wrong way to approach this local plan process.
- TWBC need to review this distribution policy, especially as only 8% supported this categorisation in the previous consultation (Ref: p.34 Appendix 1 to the Consultation Statement for the Draft Local Plan Regulation 18 Consultation September 2019).

Given the lack of support for the distribution approach at the previous stage of the local plan preparation, how can TWBC continue with this strategy at Reg 18 stage?

para. 6.7 and 6.9

This background paper sets a threshold of 10 minimum for site allocations but why was the threshold set so high? A typical threshold for minimum units is just 5 or 6 homes, allowing smaller sites to be considered. This is in line with NPPF para. 68 that states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. Why has TWBC taken a different approach?

The SHEELA contains many sites of this scale across the Borough that have not been allocated because of the artificially high threshold imposed by the draft TWBC LP.

Smaller sites can often be built out quicker than large sites and can be delivered by non-mainstream developers e.g. CLT, housing cooperatives and so on. Setting a high threshold will tend to rule these organisations out of the picture, thereby concentrating risk on a few larger players, rather than spreading risk more widely. Neighbourhood plans tend to favour a strategy based around smaller sites, more widely distributed. This threshold also undermines neighbourhood planning. Smaller sites also allow for smaller developments that give a greater opportunity to build more sustainably and of better quality than 'mass produced' developments.

Cranbrook and Hawkhurst together (both in the AONB completely) are taking the same numbers as Tunbridge Wells and Southborough combined (not in the AONB) – this cannot be right when considered against:

- para 172 of the NPPF – “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues”
• para 11 b) i and ii – this allows for a discount to be applied when seeking to meet OAN
housing figures when in locations with protected areas (e.g. AONB) or assets of
particular importance provides a strong reason for restricting the overall scale, type or
distribution of development.

p.33 footnote 19

We consider this to be a major error on the part of TWBC as it has defined the “urban area” for
planning purposes as the main urban area of Royal Tunbridge Wells and Southborough,
together with the larger rural settlements of Paddock Wood, Cranbrook, and Hawkhurst.

How can it be that smaller settlements of Cranbrook and Hawkhurst, both deep within the
AONB, can be given the same urban status as Royal Tunbridge Wells and Southborough?

This is critical because the definition of “urban area” then leads directly to a strategy that
maximises development within existing built up areas and optimised densities. While this
strategy of maximisation and optimal density may be appropriate in genuine urban areas such
as Royal Tunbridge Wells, it cannot be considered appropriate for rural communities in nationally
protected landscape areas. It is from this mistaken assumption that much disturbing content of
the draft TWBC LP follows. Correct this assumption (i.e. Cranbrook and Hawkhurst will not be
subject to the maximisation strategy) and a whole different approach is possible.
F. CONCERNS OVER THE CONSULTATION EXHIBITION PROGRAMME

- The Parish Council considers that the consultation exhibition programme for the draft TWBC Local Plan was very limited. There was only one visit to Cranbrook and Sissinghurst (Friday 27th September) at the Vestry Hall, Cranbrook, and at a time (4pm until 7pm) when few could attend. Furthermore, there was very little publicity to make it clear that Frittenden and Benenden were also being covered in the same exhibition.

- This late afternoon slot is not convenient for working families – it is either the after-school rush of supporting children in sports and activities or commuting home from work outside the Parish. Selecting this time slot is seen by many as a deliberate way to prevent a high turnout and frustrate the views of local people and, we believe, will have reduced footfall dramatically.

- The Parish Council see no reason why, for example, a 7pm until 10pm time slot could not have been used. Indeed, during the preparation of the emerging Neighbourhood Plan, the Parish has regularly made use of the same venue throughout the daytime and late into the evening to ensure maximum opportunity for people to contribute ideas and thoughts.

- “Staying late and listening to everybody” has been a key part of our Neighbourhood Plan process. The TWBC Local Plan process could learn from this.