11 November 2019  
Delivered by email

Local Plan  
Planning Policy  
Planning Services  
Tunbridge Wells Borough Council  
Town Hall  
Civic Way  
Royal Tunbridge Wells  
Kent TN1 1RS

Dear Sir/Madam

TUNBRIDGE WELLS DRAFT LOCAL PLAN (REGULATION 18) CONSULTATION  
LAND WEST OF FRYTHE WAY, CRANBROOK (SHELAA REF: 25)

Thank you for the invitation to comment on the above consultation. We write on behalf of our client, Taylor Wimpey UK Ltd, who control land west of Frythe Way, which abuts the south eastern edge of Cranbrook (SHELAA Site Ref: 25, July 2019).

Whilst our client supports the need for and benefits of strategic growth at Cranbrook, they contend the Sustainability Appraisal (September 2019) and SHELAA (July 2019) that informed the Draft Local Plan contained site assessment errors and inconsistencies, which appear to have contributed significantly to this site omission in favour of less sustainable and peripheral sites to the west and east of the settlement (Draft Allocations CRS6, CRS7 and CRS4).

For example, the conclusion of the SHELAA (July 2019) indicates that Site 25 may be unsuitable for housing, owing to a perceived ‘...concern about ability to provide an appropriate means of vehicular access to the site, which is likely to require access through adjacent site’. However, we can confirm that an ‘adjacent site’ is not needed to form a suitable and appropriate means of access to this site. Taylor Wimpey is working with local housing association, Town & Country Housing (TCH) to deliver this site. TCH own the land and properties at the end of Frythe Way, from which access is proposed to be taken. We attach a letter from TCH confirming this forms part of the red line site submission and is readily deliverable without the need for an ‘adjacent site’ (See Document A).

This factual inaccuracy within the assessment of the site in both the SHELAA (July 2019) and Sustainability Assessment (September 2019) has in our view incorrectly underscored the accessibility credentials of this site. In doing so, our client contends the Council has incorrectly discounted this option in favour of less accessible peripheral options such as draft Local Plan allocation CRS6. Our client instructed consultant transport engineers i-transport to examine and conclude on this in further detail (see appended Document B). I-transport’s assessments conclude the site has been significantly underscored against the transport sustainability objectives of the Council’s Sustainability Assessment.
(SA). Our clients respectfully request therefore that the site be reassessed in light of these factual corrections.

The second stated ground for concluding that Site 25 is unsuitable for housing relates to a perceived negative impact on landscape from the loss of a greenfield site in the AoNB adjacent to this settlement. Yet a similar comment is absent in the SHELAA in respect of draft allocations CRS7, CRS4 or CRS 6; which are also in the AoNB, yet comprise lands we contend are far less contained and related to the settlement than Site 25. Site 25 is surrounded and contained by existing landscaping that is capable of being enhanced further; comprising a highly accessible location for a modest development of the scale proposed by our clients (around 70 homes). Our client instructed landscape consultants CSA to independently assess site 25 and compare this with draft allocation sites CRS6, CRS 4 and CRS7 (see Document C). The conclusions highlight landscape impacts in respect of CRS6, CRS4 and CRS7 that appear to have been understated and/or inconsistently assessed when compared with those arising from Site 25.

For example, draft allocation CRS7 is in the AoNB, detached from the urban area and is categorised in the Council’s own landscape assessment¹ as having a ‘strong separation from adjacent settlements’ and being ‘very sensitive to any strategic development’. The western half of Site CRS7 is also stated as playing ‘a significant role in the setting of the Cranbrook Conservation Area’. Yet, unlike the assessment undertaken on Site 25, the SHELAA seeks to assess different densities and forms of development that may be acceptable in this location. The SHELAA concludes that whilst the site is detached from the settlement, it lies in proximity to it, has pedestrian access to the centre of Cranbrook and is likely to be sustainable in this context. Site 25 is conversely attached / part of the settlement, contained by existing landscaping and has arguably better pedestrian access to the centre of Cranbrook. It is therefore unclear how the Council concludes that Site 25 is not sustainable in this context. Our client can only assume that the Council have not accounted for the evidence highlighted in this letter, including that now confirmed regards a suitable access and its landscape containment credentials. Our client contends that had such evidence been accounted for, the SHELAA and SA would have concluded that Site 25 was a logical, suitable and sustainable integrated extension to Cranbrook. One that has notable advantages over one or more of the alternatives proposed at CRS6, CRS7 and CRS4 and should be ranked sequentially higher on its sustainability credentials as a consequence.

In addition, Draft Local Plan allocations CRS4 and CRS6 seek to locate development to far more peripheral locations at and beyond the settlement edge. Options that taken together seem set to contribute to the sprawl of the settlement towards the south west into Hartley. Options that do little to neither respect each settlements identity, nor reduce the need to travel by car to local services and facilities, almost all of which are located in Cranbrook. Conversely, Taylor Wimpey’s Frythe Way proposal is better located and contained; and comprises a relatively modest development (around 70 homes) that respects the character and context of its location. Our client therefore respectfully requests that TWBC re-assesses the benefits of this modest site in liaison with the Parish Council and Neighbourhood Plan Steering Group as soon as possible.

Over the last year Taylor Wimpey have appointed a full consultant team to undertake a thorough assessment of the opportunities for and benefits of growth in Cranbrook; particularly in respect of lands under their control at Frythe Way (SHELAA Site Ref. 25). As part of their assessments of this opportunity, they have started to explore an early vision for what the neighbourhood and benefits accrued from this may look like. These benefits could include, amongst others:

- The delivery of **much needed housing** (around 70 homes), including affordable housing for local people in a highly accessible and well contained location;

- The **creation of publicly accessible and diverse open spaces, footpaths and trails** through the site and into existing public rights of way to and from the countryside;

- A **new natural play space** for children located close to existing homes;

- A **trim trail for all ages** to enjoy outdoor activities, providing an attractive gateway to access public rights of way and the countryside beyond;

- **Edible landscapes** for the benefit of the wider community (including native species planting within the scheme), providing a net potential gain over the existing provision, which is presently unmanaged, largely inaccessible and of poor quality;

- A **comprehensive package of landscape and biodiversity enhancements** in keeping with the characteristics of the surrounding area.

Our client is keen to share their emerging vision for the future of this site and attaches a copy for the Council’s consideration and information (See Document D). A copy has also been provided to representatives of the local Parish Council and Neighbourhood Plan Steering Group. We would welcome an opportunity to meet with TWBC, Members of the Parish Council and the Neighbourhood Plan Steering Group to discuss this further.

The land required to deliver the proposed development, its accompanying infrastructure and community benefits is in the control of Taylor Wimpey and Town & Country Housing. It is available for development now and is considered a suitable and logical location to direct some of the future growth needed at Cranbrook. The emerging vision document appended confirms there to be no known overriding constraints to the delivery of these proposals. We would be happy to meet the Council to discuss this opportunity further.

In the interim, the following comments are made to assist the Council’s progression of the Local Plan and the evidence base required to underpin this.

<table>
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<th>Policy/Paragraph</th>
<th>Comment</th>
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| STR1 – The Development Strategy | Second Paragraph  
For transparency and clarity, it is recommended the Policy defines what the ‘identified needs of the borough over the Local Plan period’ are. This is set out in the preceding paragraphs, but not in the policy itself. |
| Housing Development | Preceding paragraphs 4.7 to 4.17 of Policy STR1 set out the Council’s proposed definition of ‘identified needs’ for housing over the plan period. Whilst we would broadly agree with the conclusions reached in respect of the baseline housing requirement or starting point, we would suggest further work is needed to quantify the contribution TWBC is able to make |
towards the unmet needs of adjoining authorities; and to addressing more of the shortfall in the borough’s supply of affordable housing.

Unmet Needs

Whilst the Council acknowledge the unmet needs of Sevenoaks (1900 homes), no further assessments appear to have been undertaken to assess whether some or all of this could be met through the emerging Local Plan. Paragraph 4.8 of the Draft Local Plan does not reference robust evidence to conclude no contribution can be made to such needs, only that TWBC has a ‘limited ability to meet any unmet housing needs from other Councils.’ To accord fully with NPPF paragraph 60 and justify the emerging Development Strategy in Policy STR1, we would suggest further work and statements of common ground are progressed on the ability or otherwise to address unmet needs of adjoining authorities; and importantly the strategy and implications for those needs that cannot be met.

In addition, TWBC will be aware of the significant unmet needs identified in the recent examiners report for the new London Plan. No mention is made of this by TWBC in either the Draft Local Plan or the Housing Needs Assessment Topic Paper (TWBC, 2019). This merits further consideration in our opinion to accord with paragraph 60 of the NPPF.

As paragraphs 28-35 of the Housing Needs Assessment Topic Paper (TWBC, 2019) outline, there is also a number of adjoining authority draft Local Plans at various stages of production at present. As acknowledged at para 33 of that document, some submitted plans may be subject to change. In addition emerging plans at Maidstone and Rother may also reveal needs that are still to be quantified. These merit further monitoring and cooperation to facilitate the drafting of statements of common ground on such matters.

Affordable Housing

Paragraph 6.1.5 of the Housing Supply and Trajectory Topic Paper (TWBC, 2019) indicates the Council are forging a plan that will fail to meet affordable housing needs identified in paragraph 48 of the Housing Needs Assessment Topic Paper (TWBC, 2019). A supply of 249 homes a year is planned against a conservative need for 341 dwellings per year. However, ten of the 249 units per year are proposed to be delivered from financial contributions secured from sites under 10 units. This is contrary to paragraph 63 of NPPF which states that “affordable housing should not be sought for residential developments that are not major developments”. This paragraph was introduced
by the government as a signal of support for SME developers who tend to deliver such sites; and whom would otherwise struggle to deliver such sites viably. Further viability evidence is required in our view to support such a requirement against paragraph 63 of the NPPF. Nevertheless, even if this were to be evidenced, affordable housing provision will still significantly undershoot need. This provides compelling evidence in our opinion, in addition to that which may arise from assessments of unmet needs of adjacent authorities, to justify testing a higher borough housing requirement through the emerging Draft Local Plan. Higher than the 14,776 proposed to be delivered through Policy STR1. As our clients site submission herein has shown, there are sites that may have been overlooked in error, sites that are available, suitable and deliverable and could be making a contribution to affordable housing provision.

Development Distribution and Delivery

As set out in Policy STR1 and Table 18 of the Housing Supply and Trajectory Topic Paper (TWBC, 2019), the Council are seeking to deliver around 67% of total new site allocations at or adjacent to Capel Parish, largely around the areas of Tudeley and Paddock Wood.

Whilst centred on a rail line, the garden settlement proposal is not served by an existing or it seems proposed safeguarded rail station. Instead reliance is placed on the delivery of significant strategic road infrastructure to service this alongside that proposed at Paddock Wood. It is not clear how this serves to reduce the need to travel by car, a key sustainability objective, nor is it clear what the implications of this are for the delivery rates proposed for both sites. Particularly as the routes, funding and delivery timetable of such significant infrastructure, including an offline A228 strategic link, has not been determined as yet. The implications of delivering this and other associated infrastructure in areas of flood risk pose significant engineering and viability challenges; and with them potential for reduced capacities and delays. Further analysis of this is therefore suggested to determine the implications for site delivery rates. We would therefore wish to reserve the right to comment further on this as more detail emerges.

Turning to delivery rates assumed for these two large growth areas. The proximity of these proposals to each other may well have an impact on the speed with which such sites come forward and the rate at which homes are delivered and absorbed into the market. The absorption rate of development in such a small market area and competition between the two sites for sales may significantly impact delivery rates. The
Housing Supply and Trajectory Topic Paper (TWBC, 2019) does not appear to assess the implications of absorption rates or the proximity of these sites to each other. Instead, reliance appears to be placed on national delivery rates on sites that do not mirror the characteristics of delivering such large sites in proximity to each other and in this borough.

TWBC rely on an assumed delivery rate for the allocations proposed in Capel/Paddock Wood of 333 homes a year. The Council acknowledge at paragraph 5.5.14 of the Housing Supply and Trajectory Topic Paper (TWBC, 2019), that this is higher than the evidenced national average of 299 homes. Whilst the latter may well be the case nationally, it does not account for the specific circumstances arising from the proximity of two large scale proposals in Tunbridge Wells Borough. Particularly the implications of expected absorption rates on delivery rates, given the proximity of these two large growth areas in such a small market area. We would suggest therefore further work is undertaken on such matters; and that a more cautious approach to delivery is taken than that proposed accordingly.

TWBC acknowledge the proposed delivery rates for both Tudeley and Paddock Wood is also dependent on the number of developers and sales outlets, which are as yet unknown. In addition, Draft Local Plan Policy STR/CA1 (‘Masterplanning and Delivery’ bullet points 3 and 4) indicate a need for potential equalisation agreements and potentially even compulsory purchase orders, to deliver planned growth. All of which contribute to a need for a more cautious approach to delivery than using uplifted national average site delivery rates. We would suggest further work is undertaken on such matters to build in a greater level of certainty; alongside the allocation of additional smaller, more deliverable sites as necessary, to help maintain a rolling five year supply of housing land. Our client’s site being an example of one such opportunity, one we would welcome further discussion with TWBC on.

The above serves to highlight the importance and exceptional need for delivering the smaller allocations around other sustainable settlements, such as Cranbrook. We support, as a minimum, the quantum of growth directed to Cranbrook through Policy STR1 in this context. Indeed, an argument could be made in light of the above for further modest growth at this settlement.

The population of Cranbrook is rapidly ageing. Since 2011, the number of residents aged 50 plus has increased by 14% while other cohorts have reduced by 10% [ONS (2019) Population estimates for small areas, Cranbrook - Cranbrook BUASD]. In parallel, average house prices in Cranbrook having risen at a
faster rate (39%) than the wider borough (32%) over the past five years (2013-2018). The average price paid for housing in Cranbrook last year was the highest in at least a decade [Turley analysis of Land Registry price paid data, based on postcodes in built-up area of Cranbrook]. A failure to retain and replenish the younger population could therefore threaten the long-term vitality of the settlement if such trends continue.

In light of this, we support the proportion of growth directed to Cranbrook, as a minimum, but recommend a reassessment of our client’s lands (SHELAA Site ref: 25) alongside proposed allocations CRS6, CRS7 and CRS4. As outlined in the introduction to our letter, our client’s site appears to have been scored incorrectly against the Council’s own SA criteria and in the Council’s SHELAA (2019). Our initial analysis suggests the site is a suitable opportunity for a modest allocation (circa 70 homes); and is superior in many respects to proposed allocations CRS6, CRS7 and CRS4. We therefore respectfully commend this site for allocation in addition to or instead of one of these allocations. We provide further comments on the allocations proposed in the Cranbrook section of the draft Local Plan below.

STR/CA1 – Strategy for Capel Parish

On the basis of the evidence base presented thus far on this and Policy STR/PW1 options, we have concerns over the scale, location and delivery expectations for these proposals. Over 67% of the Draft Local Plans new allocations are dependent on these policy options being delivered. A high degree of certainty is therefore needed to justify a strategy so heavily reliant on these. As outlined in our comments to Policy STR1 (Development Distribution and Delivery), there remains significant gaps in the evidence base underpinning the delivery assumptions for these options. We have suggested further evidence be commissioned to refine and robustly support delivery rates from this policy. The delivery uncertainties posed by such options place an added onus on delivering the smaller allocations proposed elsewhere in the district, so as to maintain a rolling five year housing land supply. We have recommended additional or alternative allocations be made in this context at Cranbrook. Specifically the allocation of our clients lands (SHELAA Site 25) for a modest development of around 70 homes in addition to, or instead of, draft Policy site CRS6 or CRS7 or CRS4. A site we believe may have been overlooked by TWBC in error through the SA and SHELAA process (see introduction to this letter and Cranbrook policies below).

STR/PW1 – Strategy for Paddock Wood

See comments above.

STR/CR51 – The Strategy for

Whilst our client supports the need for and benefits of strategic
Cranbrook and Sissinghurst Parish growth at Cranbrook, they contend the Sustainability Appraisal (September 2019) and SHELAA (July 2019) that informed this Draft Local Plan Policy contained fundamental site assessment errors and inconsistencies, which appear to have contributed significantly to the omission of SHELAA Site Ref: 25 in favour of less sustainable and peripheral sites to the west and east of the settlement (Draft Allocations CRS6, CRS7 and CRS4).

For example, the conclusion of the SHELAA (July 2019) indicates Site 25 may be unsuitable for housing, owing to a perceived ‘...concern about ability to provide an appropriate means of vehicular access to the site, which is likely to require access through adjacent site’. However, we can confirm that an ‘adjacent site’ is not needed to form a suitable and appropriate means of access to this site. Taylor Wimpey is working with local housing association, Town & Country Housing (TCH) to deliver this site. TCH own the land and properties at the end of Frythe Way, from which access is proposed to be taken. We attach a letter from TCH confirming this forms part of the red line site submission and is readily deliverable without the need for an ‘adjacent site’ (See Document A).

This factual inaccuracy within the assessment of the site in both the SHELAA (July 2019) and Sustainability Assessment (September 2019) has in our view incorrectly underscored the accessibility credentials of this site. In doing so, our client contends the Council has incorrectly discounted this option in favour of less accessible peripheral options. Our client instructed consultant transport engineers I-Transport to examine and conclude on this in further detail (see appended Document B). I-Transport’s assessments conclude that Site Ref: 25 has indeed been significantly underscored against the transport sustainability objectives of the Council’s Sustainability Assessment (SA). Our clients respectfully request therefore that the site be reassessed in light of these factual corrections.

The second stated ground for concluding that Site 25 is unsuitable for housing relates to a perceived negative impact on landscape from the loss of a greenfield site in the AoNB adjacent to this settlement. Yet a similar comment is absent in the SHELAA in respect of draft allocations CRS7, CRS4 or CRS6, which are also in the AoNB, yet comprise lands we contend are far less contained and related to the settlement than Site 25. Site 25 is surrounded and contained by existing landscaping that is capable of being enhanced further; comprising a highly accessible location for a modest development of the scale proposed by our clients (around 70 homes). Our client instructed landscape consultants CSa to independently assess site 25 and compare this with draft allocation sites CRS6, CRS4 and CRS7 (see Document C). The conclusions highlight
landscape impacts in respect of CRS6, CRS4 and CRS7 that appear to have been understated and/or inconsistently assessed and compared with those arising from Site 25.

For example, draft allocation CRS7 is in the AoNB, detached from the urban area and was categorised in the Council’s own landscape assessment\(^2\) as having a ‘strong separation from adjacent settlements’ and ‘very sensitive to any strategic development’. The western half of Site CR57 is also stated as playing ‘a significant role in the setting of the Cranbrook Conservation Area’. Yet, unlike the assessment undertaken on Site 25, the SHELAA seeks to assess different densities and forms of development that may be acceptable in this location. The SHELAA concludes that whilst the site is detached from the settlement, it lies in proximity to it, has pedestrian access to the centre of Cranbrook and is likely to be sustainable in this context. Site 25 is conversely attached / part of the settlement, contained by existing landscaping and has arguably better pedestrian access to the centre of Cranbrook. It is therefore unclear how the Council concludes that Site 25 is not sustainable in this context. Our client can only assume that the Council have not accounted for the evidence highlighted in this letter, including that now confirmed regards a suitable access and its landscape containment credentials. Our client contends that had such evidence been accounted for, the SHELAA and SA would have concluded that Site 25 is a logical, suitable and sustainable integrated extension to Cranbrook. One that has notable advantages over one or more of the alternatives proposed at sites CRS6, CRS7 and CRS4 and should be ranked sequentially higher on its sustainability credentials as a consequence.

In addition, Draft Local Plan allocations CRS4 and CRS6 seek to locate development to a far more peripheral location at and beyond the settlement edge. Options that taken together seem set to contribute to the sprawl of the settlement towards the south west into Hartley. Options that do little to respect each settlements identity, nor reduce the need to travel by car to local services and facilities, almost all of which are located in Cranbrook. Site CRS7 is detached from the urban area and at odds with the Council’s own Landscape Sensitivity Assessment\(^3\). Conversely, Taylor Wimpey’s Frythe Way proposal is better located and contained; and comprises a relatively modest development (around 70 homes) that respects the character and context of its location. Our client therefore respectfully requests that TwBC re-assesses the benefits of this modest site


\(^3\) Landscape Sensitivity Assessment of Additional Settlements in Tunbridge Wells (Paddock Wood, Horsmonden, Hawkhurst and Cranbrook), LUC, July 2018.
| AL/CRS4 – Turnden Farm, Hartley Road (SHELAA Reference: Site 430) | The development of Site CRS4 would continue built form substantially south west of Cranbrook and the existing adopted allocation to the immediate north east of the site. The cumulative impact of both these sites would be the substantial sprawl of Cranbrook south westwards away from its core, eroding the sense of separation and separate identities of Cranbrook and Hartley. Development in the eastern part of the site would also be highly visible from the public footpath to the south, which currently experiences open rural views across this area. Independent assessments of this site, versus SHELAA Site Ref:25 have been undertaken and are appended as Documents B and C. In the interests of brevity, we refer to our strategic level comments at STR/CRS1, which summarise the objections raised to the omission of SHELAA Site Ref: 25. We respectfully recommend that Site 25 be re-assessed in this context, as we contend this site merits allocation as a suitable, logical and sustainable site for around 70 homes, either in addition to CRS4, CRS6 and CRS7, or in place of one of these. All of which we contend score less favourably against the Council’s SA objectives than site 25. |
| AL/CRS6 – Gate Farm, adjacent to Hartley Road and Glassenbury Road, Hartley (Plus Bull Farm) (SHELAA reference: Sites 59, 70, 323 & 345, and Late Site 53) | This policy seeks to allocate a comparatively significant level of growth to a small hamlet/village with little or no facilities to the west of Cranbrook; an area characterised at present by linear and ribbon development along the A229. It lacks any notable facilities and would accordingly rely on Cranbrook to the east. As set out in i-transport’s assessment of this site (Document B), this option performs far worse than SHELAA Site 25 on its ability to reduce the need to travel by car for most trips. The village is without a settlement boundary and is therefore an area we suggest would normally only be appropriate for infill development. Not an option we consider sequentially preferable to Site 25, which forms part of the existing urban area of Cranbrook, is closer to its core and by foot; and is better suited and contained to accommodate development. As independent landscape consultants CSA conclude (Document C), the development of Site CRS6 would introduce a substantial area of nucleated built form, at the western edge of Hartley village which is currently characterised by linear and ribbon development along the A229. Development here would adversely affect the character of the local landscape and the rural setting of the two adjacent listed farmhouses. Development of the north western field in particular would be prominent at the top of the hillside and is likely to be highly visible in views from the rural landscape to the west. As set out in comments to Policy STR/CRS1, we respectfully recommend |
| AL/CRS7 – Land off Golford Road  
(SHELAA Reference: Late Site 32) | SHELAA Site 25 be re-assessed in this context, as we contend this site merits allocation as a suitable, logical and sustainable site for around 70 homes, either in addition to CRS4, CRS6 and CRS7, or in place of one of these. All of which we contend score less favourably against the Council’s SA objectives than site 25.  

|   | As set out in our comments to Policy STR/CS1, our client instructed landscape consultants C5a to independently assess SHELAA Site 25 and compare this with draft allocation sites CRS6, CRS4 and CRS7 (see Document C). The conclusions highlight landscape impacts in respect of CRS6, CRS4 and CRS7 that appear to have been understated and/or inconsistently assessed and compared with those arising from Site 25.  

For example, draft allocation CRS7 is in the AoNB, detached from the urban area and was categorised in the Council’s own landscape assessment as having a ‘strong separation from adjacent settlements’ and being ‘very sensitive to any strategic development’. The western half of Site CRS7 is also stated as playing ‘a significant role in the setting of the Cranbrook Conservation Area’. Yet, unlike the assessment undertaken on Site 25, the SHELAA seeks to assess different densities and forms of development that may be acceptable in this location. The SHELAA concludes that whilst the site is detached from the settlement, it lies in proximity to it, has pedestrian access to the centre of Cranbrook and is likely to be sustainable in this context. SHELAA Site 25 is conversely attached / part of the settlement, contained by existing landscaping and has arguably better pedestrian access to the centre of Cranbrook. It is therefore unclear how the Council concludes that Site 25 is not sustainable in this context. Our client can only assume that the Council have not accounted for the evidence highlighted in this letter, including that now confirmed regards a suitable access and landscape containment credentials. Our client contends that had such evidence been accounted for, the SHELAA and SA would have concluded that Site 25 is a logical, suitable and sustainable integrated extension to Cranbrook. One that has notable advantages over one or more of the alternatives proposed at CRS6, CRS7 and CRS4 and should be ranked sequentially higher on its sustainability credentials as a consequence.  

Our client therefore respectfully requests that TWBC re-assesses the benefits of this modest site in liaison with the Parish Council and Neighbourhood Plan Steering Group as soon as possible.  

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<th>EN1 – Design and other development management criteria</th>
<th>Landscaping, Trees and Amenity (First Criterion)</th>
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<td>Whilst the objective sought from this is laudable, there may be instances where existing trees are nearing the end of their lifespan, or are of poor quality and would benefit from management and selective replacement, or that the benefits of development outweigh the loss of a small number of poor quality trees. In such instances, replacement native species planting in appropriate locations on or off-site that serve to reinforce the character of an area must surely be more appropriate than retention of all trees, irrespective of their value or other material considerations, at all costs. This approach is reflected in Policy EN14.</td>
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<td>Suggest this criterion is amended to reflect and be consistent with Policy EN14.</td>
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<th>EN2 – Sustainable Design and Construction</th>
<th>Site Location and Layout (1st and 2nd Criterion)</th>
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<td>It is assumed the use of the word 'Prioritise' at the start of criterion 1 and 2 relates to windfall development, as the location of allocations will have taken such matters on board through the SA and site allocation process. It is unclear therefore how the introduction of such a sequential test would be applied in practice. It may be more appropriate to replace this word to highlight developments in locations that help to foster more sustainable patterns of development will be looked upon more favourably.</td>
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<td><strong>Development Design (6th Criterion)</strong></td>
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<td>It is unclear what this criterion is seeking to achieve or how it would be applied in practice to every development. This needs further attention and detail, or deletion as the current wording is not effective.</td>
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<th>EN4 – Energy Reduction in New Buildings</th>
<th>Criterion 2</th>
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<td>This implies a reduction in excess of current government guidance through building regulations. The reductions achieved should be calculated using a combination of fabric first and renewables, not after fabric first to be consistent with current government guidance (G-012 of PPG), or any updates to such guidance as may be published over the plan period.</td>
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| EN11 – Net Gains for Nature: biodiversity | This policy will need to have regard to the final form of an enacted Environment Bill, if and when finalised. This may necessitate further borough wide assessments and viability testing to ensure a holistic and deliverable approach is being |
| EN16 – Green, Grey, and Blue Infrastructure | The words ‘protect existing’ contradict the effectiveness of Policy EN14 which adopts a more appropriate, effective and practical approach to existing features. Whilst it may be desirable to retain and where possible enhance existing features as part of a development, some may be better replaced and enhanced in the form of new features on or off-site as part of a comprehensive approach to development. Suggest these words be revised to be consistent with Policy EN14 and others that instil the required flexibility to be effective and endure the plan period. |
| EN28 – Sustainable Drainage | The aim for run off to be reduced below existing greenfield rates may be laudable, but equally may be undeliverable in all situations, particularly on brownfield sites. In such instances, it may be more appropriate to seek net improvement over existing run off rates as close as possible to or preferably in excess of greenfield rates where this is proven capable of being achieved in a viable manner. |
| H3 – Housing Mix | The last paragraph is insufficiently flexible to be effective over the borough as a whole and over the plan period. There may be instances for example where additional local needs evidence or site specific circumstances dictate a need for an alternative mix to be considered, one that is more suited to the site and the surrounding character than may otherwise be dictated by a centrally administered housing needs register. Suggest that this is instead a material consideration, with applicants required to have regard to this and submit robust evidence justifying the need for any departure from this as necessary. |
| H4 – Housing Density | The wording proposed is unclear and potentially incompatible with policies EN1 and EN2. The objective we assume is to seek to make efficient use of land at densities appropriate to the sites location and context. Suggest this policy is rewording to make this clearer, such as:  

‘Developments shall make efficient use of land at densities appropriate to their location and context, including landscape, topography, surrounding built form and any other relevant factors’ |
| H11 – Self-Build and Custom Housebuilding | The policy aspiration, whilst laudable, does not appear to have been forged from the guidance at paragraph 57-14 of PPG, which requires a more holistic approach be taken to addressing
such needs registers through a series of options, rather than just on sites proposing to deliver over 100 homes. We would recommend further assessments are undertaken to determine the strategy and contribution from all sources, not just large development sites.

We trust these comments are useful and duly noted. We would welcome the opportunity to meet to discuss such matters further with Tunbridge Wells Borough Council, Cranbrook and Sissinghurst Parish Council and Neighbourhood Plan Steering Group over the coming months.

Yours sincerely

Ryan Johnson
Director, Head of Residential Sector

Enc.

(Documents A-D)