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Reference:
Date: Thursday 15 August 2019

Dear All

CABINET - THURSDAY 15 AUGUST 2019

I enclose, for consideration at the next meeting of the Cabinet on Thursday 15 August 2019, the following items that were unavailable when the agenda was published.

Agenda No	Item
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| 8 | Consultation on Draft Local Plan 2016 - 2036 (Regulation 18) and Sustainability Appraisal (Pages 3 - 18) |
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Errata – Amendments to the Draft Local Plan

Kind regards,

Mark O'Callaghan
Scrutiny and Engagement Officer

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Draft Local Plan Reg 18 and Sustainability Appraisal

Errata: text in bold indicates additional text, wording “struck through” to be deleted

Identified typographical errors have been amended

Para/Page	Details/Query	Proposed Change
Para 1.21 (page 13)	Should status of Hawkhurst neighbourhood plan policies post adoption of the Local Plan be confirmed?	Para 1.21: Additional sentence to state: “Some policies in the Hawkhurst NDP will be superseded. These will be specified in the Pre-Submission Version of the Local Plan, once the emerging policies in the Local Plan have been finalised”. Note: please see comment under Para 4.78
Figure 3: Borough Overview Map (page 21)	To updated to reflect the colouration and key of the revised Key Diagram (Figure 4 – please see below), as this will appear more clearly on paper and webpage	Update map
Para 4.16 (page 33)	Needs added clarification that the 14,776 is a culmination of not only extant planning consents, SALP allocations, and new allocations, but also completions and the windfall allowance. Within the same paragraph, it is also worth noting that for the new allocations, the mid-point of allocations with a residential range has been applied as per the method used for the trajectory.	“It can be seen that the total capacity of all identified sites (completed houses since 2016 , outstanding planning permissions, retained Site Allocations Local Plan allocations, development through windfall sites , together with new allocations proposed in this Draft Local Plan) provides for some 14,776 net additional dwellings. This compares to a minimum requirement of some 13,560 dwellings, thereby providing a sufficient amount of oversupply equivalent to some 9%. Where a range of housing numbers is provided in a policy for the outstanding site allocations and proposed allocations, the figure used in the above calculations is the mid point of this range. This reflects the approach take in the housing trajectory”
Figure 4: Key Diagram (page 38)	Map has been refreshed to make clearer and to include the allocation at Mableden and Nightingale (Southborough) – please see image on last page of this document	Replace with image on last page
Para 4.46 (page 46)	Adjust so is clear that stated allocation proposals in Capel and Paddock Wood masterplan area	- “Torrington and Vale Avenue, Royal Tunbridge Wells (Policy AL/RTW 4); - Land at Mabledon and Nightingale, Southborough (Policy AL/SO 3);

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	<p>should be taken into account in masterplanning, and to avoid duplication between policies AL/CA 3 and AL/PW 1 (Capel and Paddock Wood).</p> <p>Also, states that masterplans are expected to guide proposed “major development at” and then a list of allocations that are all larger allocations.</p> <p>This include ALs/CRS10 Cranbrook School that is considered as requiring a masterplan to ensure proposals can be understood within the context of the site continuing to provide education etc and ensuring development proposals do (a) not compromise this and (b) not result in need for development elsewhere to meet future educational demands that could otherwise have been met on-site.</p> <p>Suggestion is that it could be clearer that major development is not proposed at the main Cranbrook School site.</p>	<ul style="list-style-type: none"> - Tudeley Village, Capel (Policy AL/CA 1); - Capel and Paddock Wood (Policies AL/CA3 and AL/PW1), Paddock Wood Town Centre (AL/PW 2) and Land at the Memorial Field, west of Maidstone Road (AL/PW 4); — Paddock Wood and land to the east of Capel parish, Capel (Policy AL/CA 3); — Paddock Wood and land in Capel (land located to the west of Paddock Wood) (Policy AL/PW 1); — Paddock Wood Town Centre (Policy AL/PW 2); - Gate Farm, adjacent to Hartley Road and Glassenbury Road (plus Bull Farm), Cranbrook (Policy AL/CRS 6); - Cranbrook School (Policy AL/CRS 10): please note the requirement for masterplanning at this site is so that the impact of any proposals can be assessed holistically in relation to the future operation of the school; - Land forming part of the Hawkhurst Golf Course to the north of the High Street), Hawkhurst (Policy AL/HA 1).”
Policy STR6 Transport and Parking (c) (page 51)	Is reference to A228 Colts Hill?	Ensure that there is a consistent reference to “off-line A228, Colts Hill By-pass”
Para 4.78 (page 56)	To provide further clarity on how policies in made neighbourhood plans will be affected by the Local Plan.	<p>“The weight given to neighbourhood plans will increase as they progress through their stages and, once made, their policies will take precedence over earlier Local Plan policies if there are any overlaps or conflicts (if made after the Local Plan is adopted). For those neighbourhood plans which are already made at the time of adoption of the Local Plan, the NPPF is clear that where policies in the neighbourhood plan are in conflict with the policies in the Local Plan, these will be superseded by the Local Plan policies. An assessment will be made of all policies in made neighbourhood plans ahead of the Pre-Submission and then adoption versions of the Local Plan as to whether the policies within these would be superseded by the policies in the Local Plan. These will be discussed with the relevant Parish and Town Councils, and included in a list of</p>

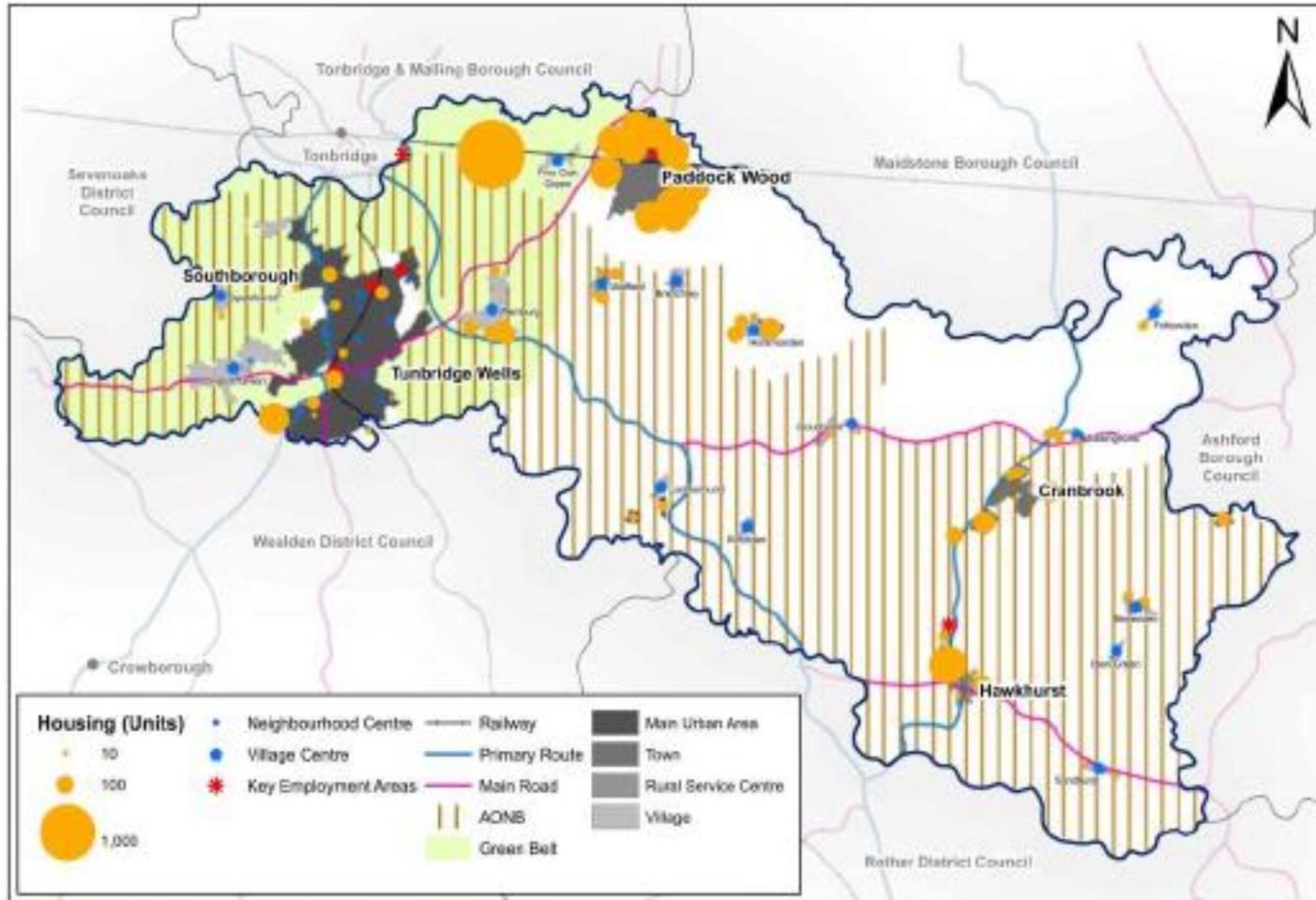
Para/Page	Details/Query	Proposed Change
		superseded policies in these versions of the Local Plan.“
Policy STR/RTW1: The strategy for RTW (pages 65 – 67)	Current wording is not consistent with remainder of STR/Place policies, in that it refers to the main urban area. Some proposals, e.g. the sports hub at Hawkenbury Recreation Ground, would be outside the Limits to Built Development. Therefore proposed to change to ensure consistency	“In the unparished area at At the Main Urban Area of Royal Tunbridge Wells, as defined by the Limits to Built Development on the Royal Tunbridge Wells draft Policies Map, proposals shall accord with the following requirements:”
Policy AL/RTW15: Land at Knights Park (page 99)	Inclusion of the woodland strip along western boundary of site within the landscape buffer	Amend Policies Maps and Map 15 to include additional landscape buffer as per plan shown below
Policy STR/SO 1: The strategy for Southborough (page 139)	As with Policy STR/RTW 1 the current wording is not consistent with remainder of STR/Place policies, in that it refers to the main urban area. Some proposals, e.g. land at Mabledon and Nightingale is outside the Main Urban Area Therefore proposed to change to ensure consistency	“At the parish Main Urban Area of Southborough, as defined on the draft Policies Map, proposals shall accord with the following requirements:”
Para 5.56 (page 145)	This is supporting text for Policy AL/SO 3: Land at Mabledon and Nightingale. It is proposed to amend in order to provide greater clarity on this allocation	“The site is indicated by a star on the draft Policies Map as the extent and location of development is to be determined by further studies and masterplanning, although the scale of development is constrained by the requirements and of the proposed policy. It is centred on Mabledon Farm, a historic farmstead on the border with Tonbridge & Malling borough, which includes a number of residential properties and farm buildings.”
Policy ST/CA1: Strategy for Capel Parish (Pages 143 – 155)	Amend criterion 3 and contribution criterion b to provide further clarity on primary school provision to reflect most up-to-date advice from KCC education and to ensure consistency with Infrastructure Delivery Plan	Criterion 3: “The provision of either one 3 forms of entry or two 2 forms of entry primary schools within Tudeley village and/or 1 form of entry expansion of the existing Capel Primary School at Five Oak Green of a new primary school within Tudeley Village and the expansion of Capel primary school”; Contribution criterion B: “Education: the provision of a new secondary school to the west of Tudeley Village and to the east of Tonbridge (Policy AL/CA 2), as well as either one 3 forms of entry or two 2 forms of entry primary schools within Tudeley village and/or 1 form of entry expansion of the existing Capel Primary School at Five Oak Green for a new primary school within Tudeley Village, the expansion of Capel primary school, and additional primary schools within land at Capel and

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	Amend Masterplanning and Delivery point 1 bullet point 3 to ensure consistency	Paddock Wood; “A masterplan for the area to be allocated under Policies AL/CA 3 and AL/PW 1, AL/PW 2, AL/PW4 and other existing areas of and adjacent to Paddock Wood (including on land between the A228 and B1260 Maidstone Road within Maidstone borough and any additional land required for flood storage/attenuation/mitigation)”;
Policy AL/CA3: Land at Capel and PW (pages 163-165)	Amend allocation point 5 to provide further clarity on sports provision and to ensure consistency with Infrastructure Delivery Plan. New requirement criterion 14 to factor in the potential need to safeguard land around the waste water treatment works for future expansion	“The provision of open space, youth and children’s play and sports facilities (including a swimming pool and new outdoor sports hub) and recreational facilities as well as areas of natural and semi-natural green space and allotments/food growing areas (see Policy OSSR 2: The provision of publicly accessible open space and recreation)”; “ Land shall, if identified as necessary for this Plan period or beyond, be safeguarded for the future expansion of the waste water treatment works at Paddock Wood ”.
Policy STR/PW 1	Amend Masterplanning and Delivery point 1 bullet point 2 to ensure consistency	“A masterplan for the area to be allocated under Policies AL/CA 3 and AL/PW 1, AL/PW 2, AL/PW4 and other existing areas of and adjacent to Paddock Wood (including on land between the A228 and B1260 Maidstone Road within Maidstone borough and any additional land required for flood storage/attenuation/mitigation)”;
Policy AL/PW1: Land at Capel and PW (pages 172 - 174)	Amend allocation point 5 to provide further clarity on sports provision and to ensure consistency with Infrastructure Delivery Plan. New requirement criterion 14 to factor in the potential need to safeguard land around the waste water treatment works for future expansion	“The provision of open space, youth and children’s play and sports facilities (including a swimming pool and new outdoor sports hub) and recreational facilities as well as areas of natural and semi-natural green space and allotments/food growing areas (see Policy OSSR 2: The provision of publicly accessible open space and recreation)”; “ Land shall, if identified as necessary for this Plan period or beyond, be safeguarded for the future expansion of the waste water treatment works at Paddock Wood ”.
Policy STR/CRS 1 (page 196)	Correction (policy numbers) and consistency (reference to “in this Plan period....”)	Approximately 718-803 new dwellings will be delivered on nine sites allocated in this Plan period in Cranbrook* (Policies AL/CRS 1-9 1-3, 5-7 and 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

Para/Page	Details/Query	Proposed Change
		sites, the following already have planning permission: AL/CRS 4 for 36 dwellings and CRS 8 for 28 dwellings;
Policy AL/CRS 4: Turnden Farm (page 205)	Delete incorrect reference to “mixed use scheme” – i.e. clarity that this is a residential allocation To make minor adjustments to the extent of landscape buffering to reflect additional information provided	This site, as defined on the Cranbrook draft Policies Map, is allocated for a mixed use scheme, including potential employment provision , approximately 160-170 (124-134 new additional) dwellings, and significant green infrastructure.
Policy AL/CRS5: Land Adj Cranbrook Primary (pages 205 – 207)	Red line for allocation includes the built development towards NE corner of the site (nursery building) – but this is excluded from the cfs submissions 71 and 133	<ul style="list-style-type: none"> - Amend Policies Map and Map 48 on page 206 (please see below); - Amend policy wording: This site, as defined on the Cranbrook draft Policies Map, is allocated for residential development (C3) providing approximately 35-45 dwellings, replacement children's nursery, and safeguarding of land for future primary school expansion”.
AL/CRS10: Cranbrook School (pages 216 – 217)	Agents acting for Cranbrook school have indicated that a small part of the school’s ownership has not been included in the allocation. As this is a policy which requires there is a holistic approach to proposals at the school, it is appropriate to include this.	Amend Map 53 – please see below
Policy AL/HA 1: Hawkhurst Golf Club (pages 239 – 241)	Site did not include other land under same landowner, which forms part of current allocation in Site Allocations Local Plan (2016). Extent of proposed allocation to be amended to reflect this, and LBD to be extended to include this land (i.e. to reflect current situation)	Amend Map 61 – please see below
Policy AL/HA2: Land at the White House (pages 242 – 243)	Slight contradiction in policy allocation (conversion of The White House) and requirement 1 (“opportunities to be explored for the retention and conversion of The White House”). Requirement 1 to be deleted, plus additional wording changes, for clarity.	<p>“This site, as defined on the Hawkhurst draft Policies Map, is allocated for residential development (C3) providing approximately 15 residential units, to include conversion of The White House (a non-designated heritage asset - see Policy EN 7: Heritage Assets). Alternatively, a higher number of apartments for the elderly could be provided, but this must again include the conversion of the White House (rather than its demolition).</p> <p>Development of the site shall accord with the following requirements: 1. Opportunities to be explored for the retention and conversion of The White House, a non-</p>

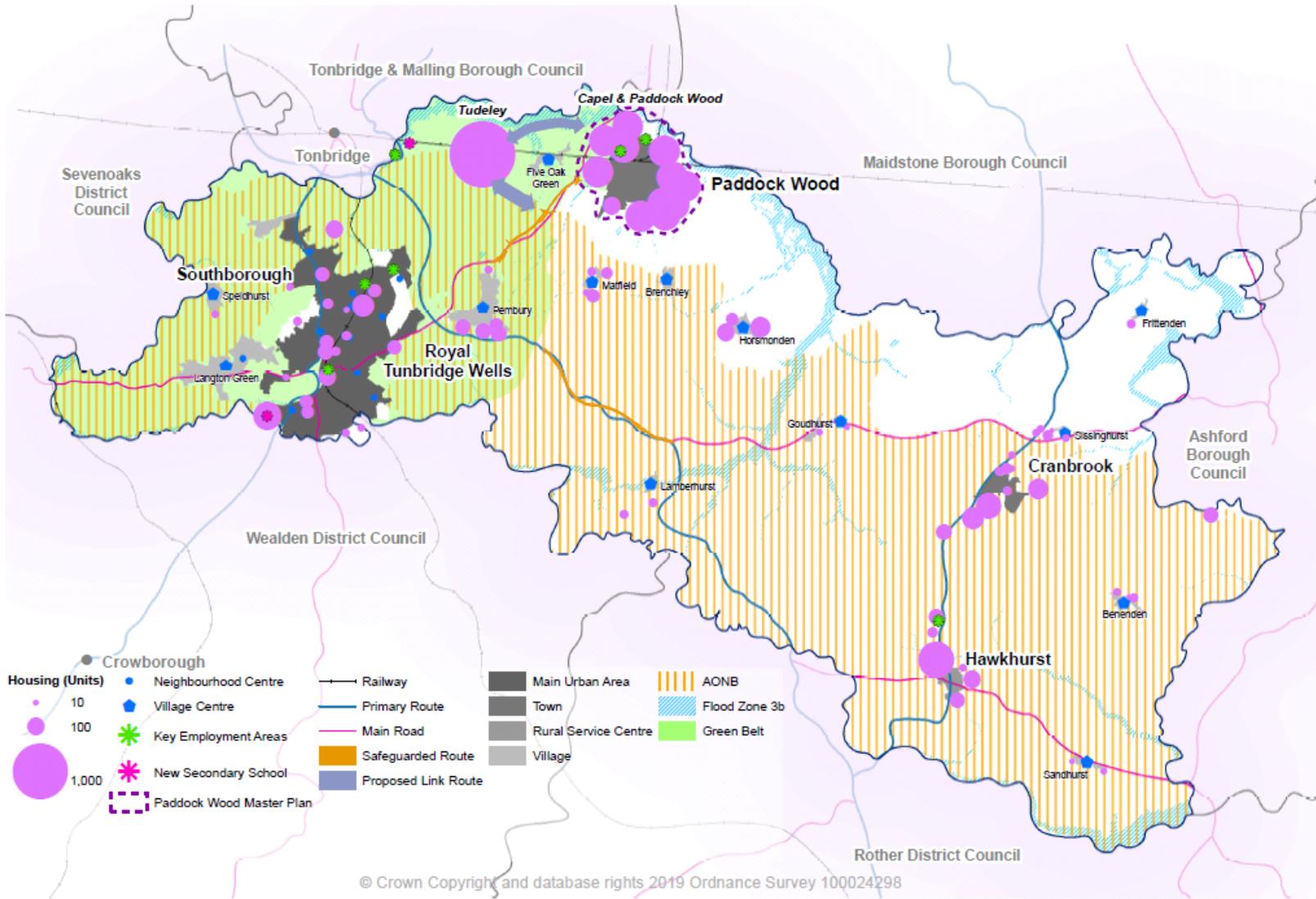
Para/Page	Details/Query	Proposed Change
		designated heritage asset (see Policy EN 7: Heritage Assets);"
Policy AL/HO 3: Land to the east of Horsmonden (page 310)	Remove reference to Call for Site "Late Site 42" as this is not included in the allocation. No need to amend Policy Map(s) as not included	"Policy AL/HO 3 Land to the east of Horsmonden (CfS reference: Sites 82, 108, 297, and 324 and Late Site 42)"
Policy STR/PE1: The strategy for Pembury (pages 321 – 322)	To provide clarity on contributions for sport and recreation	"It is expected that contributions will be required towards the following if necessary to mitigate the impact of the development:... d. A new sports hub at Hawkenbury recreation ground, to include standing/seating for supporters and other ancillary structures, and other sports and recreation grounds and built facilities, open space and children's play space and qualitative improvements to existing pitches at Pembury at Woodside Road and land off Henwood Green Road (adjacent to the Parish Council Offices);"
Policy AL/PE 4: Dowdingbury Farm (pages 329 – 330)	Possibly slight amendment to Map 90 to ensure consistency with land ownership and removal of reference to Site 420	Map 90 to potentially be slightly adjusted – to be confirmed following further land ownership clarification "Policy AL/PE 4 Land at Downingbury Farm, Maidstone Road (CfS reference: Sites 375 and 420)"
Para 6.33	To reflect decision of Full Council on 17 th July 2019	"With this in mind, and the knowledge that the NPPF states that places should be shaped in ways that contribute to "radical reductions in greenhouse gas emissions", the urgency for action becomes clear. As a borough, the Council has produced a Climate Local declaration (footnote 37) (2014), has declared its recognition of global climate and biodiversity emergencies and its ambition to make the Council's operations carbon neutral by 2030 (provide footnote to minutes of Full Council on 17th July 2019, once available on TWBC website) and is assisting in the preparation of the Kent and Medway Local Emissions Strategy. However, the planning system has a key role to play in meeting the challenge of reducing CO2 emissions, and must do more". Yes
Sustainability Appraisal	All reference to AL/RU1 currently include a secondary school (as there was, prior to clarification from KCC Education that an additional secondary school was not required, consideration given to this site for such an allocation). Relevant sections of Appendix R and Chapter 8 to be reviewed, and assessment to be undertaken again, with cumulative impacts adjusted.	

Figure 4 Key Diagram



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Proposed Figure 4: Key Diagram



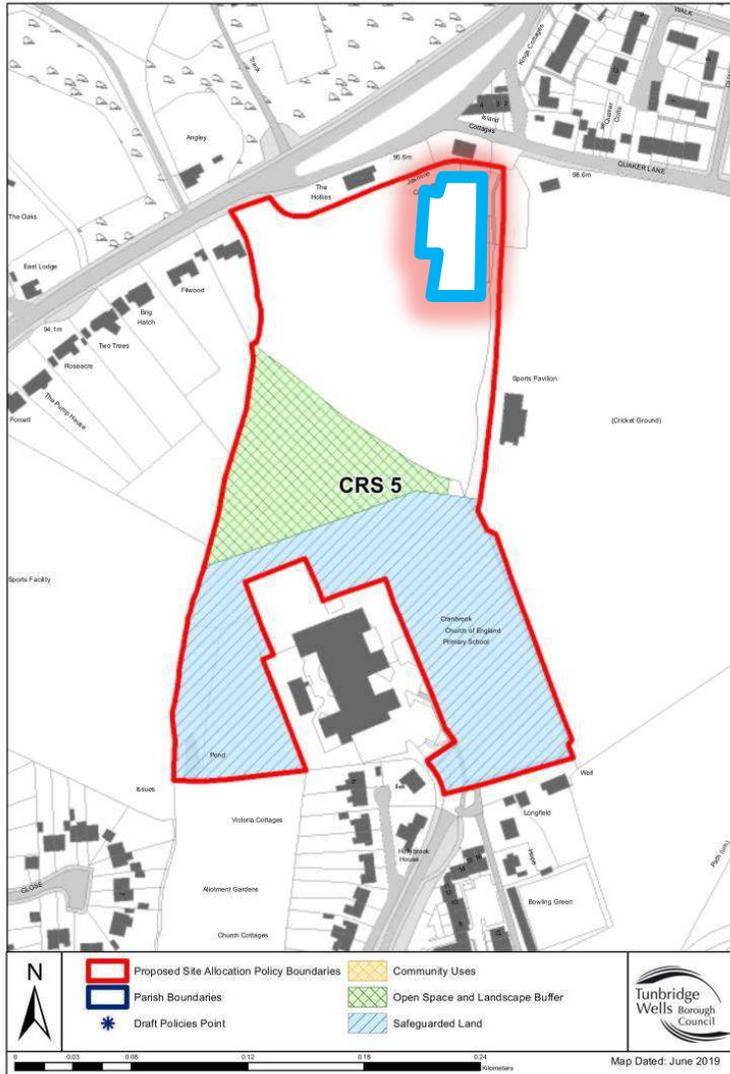
Section of additional landscape buffer to be provided in Map 15 AI/RTW 15: Land at Knights Park

Map 15 Policy AI/RTW 15



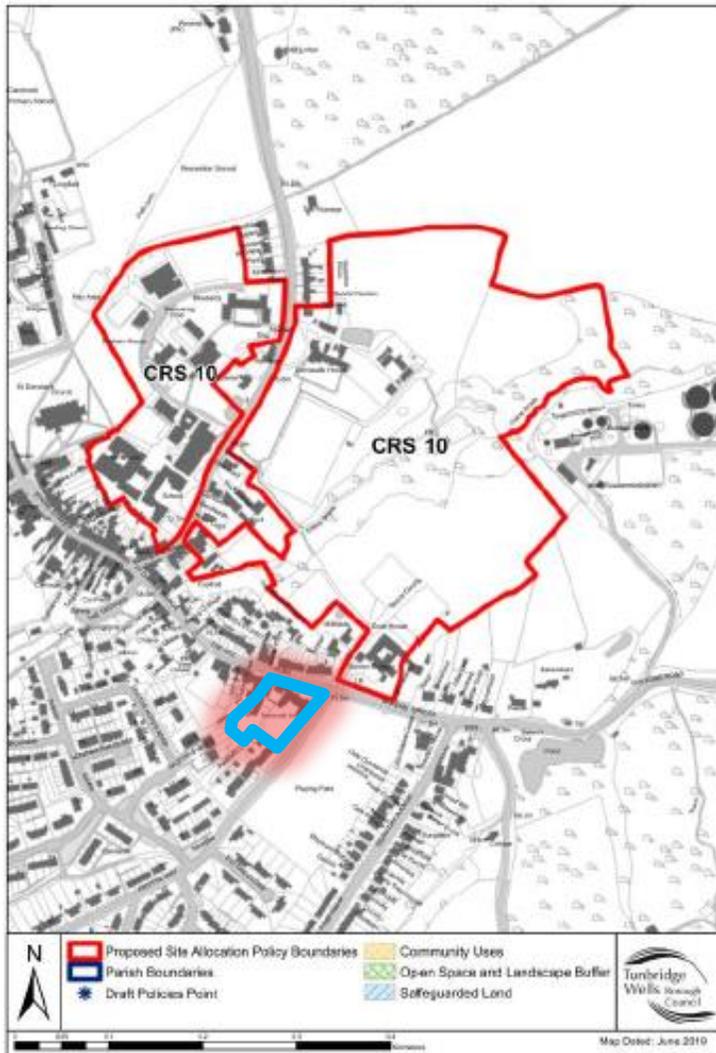
Section of proposed allocation AL/CRS 5 as shown on Map 48 in Draft Local Plan to be removed from proposed allocation

TWBC Draft Local Plan: Proposed Site Allocations



Section of Map 53 amended to include additional land in ownership of Cranbrook School

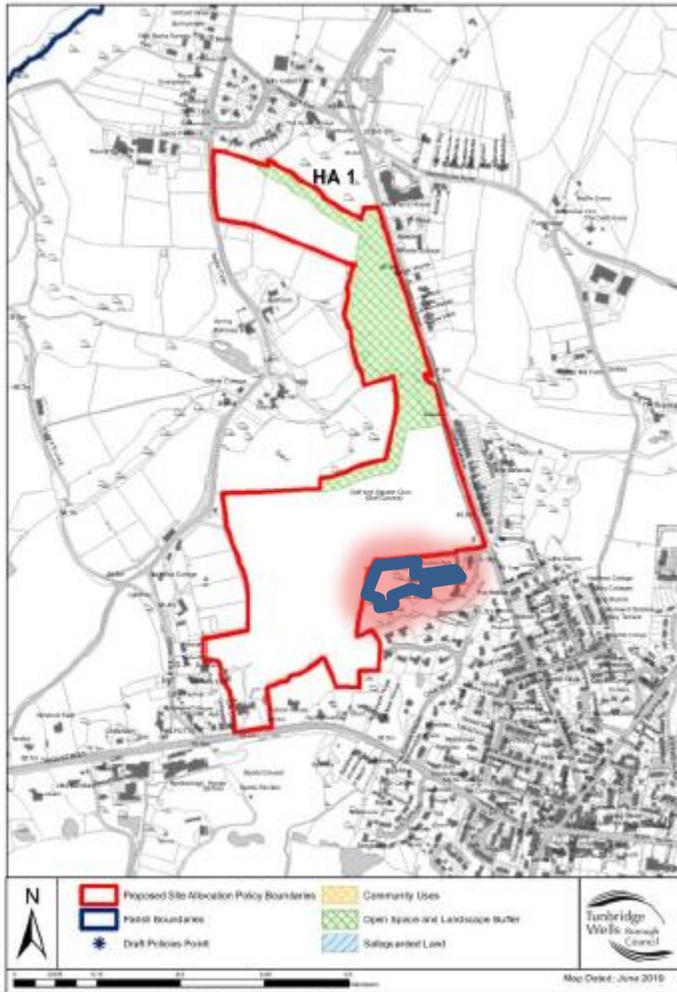
TWBC Draft Local Plan: Proposed Site Allocations



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Section of land to south to be included in policy AL/HA1 (Map 61) which reflects existing allocation in Site Allocations Local Plan 2016

TWBC Draft Local Plan: Proposed Site Allocations



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