

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
19	Section 1: Introduction Producing a new Local Plan	Neighbourhood Plans	Provision and Delivery of County Council Community Services	The County Council considers that whilst neighbourhood level funding for park benches and planters is important - KCC considers that in some instances, critical infrastructure such as education facilities should take precedence.
24	Section 2: Setting the Scene Challenges and Opportunities		Waste Management	<p>The significant development within the borough will undoubtedly put pressure on the waste services provided by KCC in this area. KCC as the Waste Disposal Authority provides a Waste Transfer Station (WTS) at North Farm for the receipt of kerbside waste collected by Waste Collection Authorities (both Tunbridge Wells Borough Council and some of Tonbridge and Malling Borough). There is also a co-located Household Waste and Recycling Centre for residents to dispose of household waste. Both of these facilities are strategic, serving not only the whole of Tunbridge Wells Borough area but also parts of adjoining Districts.</p> <p>Paragraph 2.10 and 2.11 refer to a Development Constraints Study of October 2016. KCC would like to see consideration of Waste Infrastructure. KCC is pleased to see that Waste Infrastructure is referred to in Section 2.17 and is included in the new Infrastructure Delivery Plan dated August 2019.</p>
25	Section 2: Setting the Scene Challenges and Opportunities	Sustainable Development	Provision and Delivery of County Council Community Services	The County Council requests that reference is made to the Kent Design Guide (currently being refreshed for 2020 publication).
26	Section 2: Setting the Scene Borough Profile and Context	Challenges and Opportunities Transport	Transport Policy	<p>The County Council is generally supportive of the policies set out as part of the Draft Plan, which mirror KCC priorities from a transportation policy perspective.</p> <p>In 2017, KCC published and adopted its Local Transport Plan 4 (2017) <i>Delivering Growth without Gridlock 2016-2031</i>. It would therefore be preferable for this document to be referenced instead. This should be referred to within the Local Plan and supporting evidence base as opposed LTP3.</p>
28	Section 2: Setting the Scene Borough Profile and Context	Challenges and Opportunities Town Centres and Retail	Provision and Delivery of County Council Community Services	The County Council would like to see consideration of how the Borough Council, working with KCC as appropriate, will be looking to revitalise the town centre, creating a range of uses that are resilient to the changing needs of the high street.
29	Section 2: Setting the Scene Borough Profile and Context	Challenges and Opportunities Natural, built and historic environment	Heritage Conservation	Paragraph 2.42 'Archaeological sites' should be added to the list of heritage assets in the Borough.
31	Section 3: Vision and Objectives Vision	Vision and Objectives 1	Provision and Delivery of County Council Community Services	<p><u>Bullet 2 and 3</u> –</p> <p>The scale of development at Paddock Wood and Tudeley Village is considerable, it is therefore <u>critical</u> that KCC services are considered at an early stage for education, communities, youth, social care and broadband infrastructure to be commensurate with the scale of the development and future proofed to cater for the growing community</p>
			Sustainable Business and Community	<p>KCC is supportive of the Plan's approach to sustainable development and welcomes the Plan's policies to support the transition to a zero-carbon economy; including high standards of energy and water efficiency, improving climate change resilience, biodiversity and green infrastructure, supporting innovative low carbon transport options and renewable energy and tackling poor air quality.</p> <p>The Plan sets out proposals for the development of new garden village settlements, as well as significant expansion to existing urban areas. The Plan could further support the zero-carbon agenda by identifying where there is potential for these new settlements to become zero-carbon development hubs. This would demonstrate the Borough's support for and encourage investment in trials and pilots of new zero-carbon technologies and infrastructure.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				The transport challenge and opportunities section (paragraphs 2.23-2.27) must acknowledge the rapidly changing nature of transport. In particular, the section should acknowledge that the period of transition to electric and alternatively fuelled vehicles and that there is increasing use of shared/on demand vehicles. Whilst these issues are included in later paragraphs and policies, the rapid transformation expected during the Plan's lifetime is significant enough to warrant inclusion within this high level section.
			Heritage Conservation	KCC welcomes the recognition that the design of all developments must be of high-quality design and must take account of the outstanding built and historic environment of the Borough.
32	Section 3: Vision and Objectives Strategic Objectives	Vision and Objectives 2	Provision and Delivery of County Council Community Services	Paragraph 9 - KCC supports the objective to establish garden settlements as a model of future delivery, providing they are suitably located with respect to existing infrastructure; upgrades to existing infrastructure are properly assessed for their ability to cope with new development and new supporting infrastructure is appropriate in terms of scale. Appropriate land requirements to provide self-contained education facilities in particular (including parking and drop off) need to be considered.
			Heritage Conservation	The inclusion of Strategic Objective 6 is welcomed - "To protect the valued heritage, and built and natural environments of the borough, including the AONB and to achieve net gains for nature."
42	Section 4: The Development Strategy and Strategic Policies The Development Strategy	Policy STR 1	Highways and Transportation	The County Council, as Local Highway Authority objects to the policy. The policy states under paragraph 4 "...delivery of significant infrastructure improvements in the form of a relief road from Cranbrook Road to Rye Road, providing significant improvements to the crossroads in the centre of Hawkhurst (Highgate)". Based on assessments to date, the provision of the new road as part of the live Hawkhurst Golf Club application (Ref 19/02025/HYBRID) does not achieve any improvement to the flow of traffic through the junction. The Hawkhurst Golf Club allocation, plus subsequent allocations in Hawkhurst, will not be supported by the Local Highway Authority owing to the severe cumulative impact on the crossroads in the village.
			Provision and Delivery of County Council Community Services	Paragraph 5 - The County Council would welcome more specific commentary about the social care and community facilities requirement within this policy.
47	Section 4: The Development Strategy and Strategic Policies Delivering Sustainable Development	Policy STR 2	Highways and Transportation	The Local Highway Authority supports the policy.
"	Section 4: The Development Strategy and Strategic Policies Masterplanning and use of Compulsory Purchase powers	Policy STR 3	Highways and Transportation	The Local Highway Authority supports the policy.
			Provision and Delivery of County Council Community Services	KCC is supportive of the proposal to use Compulsory Purchase Powers if and where required to positively secure land for infrastructure development.
50	Section 4: The Development Strategy and Strategic Policies The borough's Green Belt	Policy STR 4	Highways and Transportation	The Local Highway Authority does not have any comment on this policy.
51	Section 4: The Development Strategy and	Policy STR 5	Highways and Transportation	The Local Highway Authority conditionally supports this policy.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Strategic Policies Essential infrastructure and connectivity			<p>The following amendments should be made:</p> <p>Paragraph 2 – “Detailed specifications of the <i>site specific mitigation schemes/contributions required</i> should be include within the Policy”</p> <p>Paragraph 5 – “New residential and commercial development will be supported if sufficient infrastructure capacity is either available, or can be provided in time to serve the development. For those strategic sites where the provision of infrastructure is required <i>to mitigate the impact of the development</i>, the delivery of this will be agreed through a masterplanning process.”</p>
			Provision and Delivery of County Council Community Services	<p>The County Council is supportive of references to essential infrastructure and connectivity.</p> <p>The County Council considers that the health paragraph provides a specific opportunity to reference the social care elements of provision here including Extra Care accommodation and wheelchair accessible and adaptable homes</p>
			Waste Management	<p>The County Council requests the inclusion of Waste in this policy, suggested text is as follows:</p> <p><i>Provision will be made for sufficient waste capacity in the form of expanded or new waste infrastructure, with all relevant developments contributing to these through land and/or contributions and strategic developments providing land and contributing to the cost of delivering new waste infrastructure. Any new provision will be determined through consultation with KCC.</i></p>
54	Section 4: The Development Strategy and Strategic Policies Transport	Policy STR 6	Highways and Transportation	<p>Paragraph 4.60 - KCC as Local Highway Authority agrees with the ambitions of Tunbridge Wells Borough Council, as set out in this paragraph to maintain and enhance the rail and bus networks and services and “encourage an efficient and improved strategic public transport network and safeguard any routes that may be required in the future, in places that will cater to those who commute, and will encourage a reduction in the necessity for the private car”.</p> <p>However, the allocation of the Park & Ride site at Woodsgate Corner (AL/PE 7) as car showrooms goes against the objectives of this paragraph. The proposed removal of this Park & Ride site from the Local Plan effectively removes the chance of an improved direct public transport service into the town. With the levels of proposed growth to the north of this site further along the A228 corridor, the safeguarding of this well located site for Park & Ride (or innovative alternative) is vital. The inability to deliver a Park and Ride site could put uncertainty on the Borough Councils ability to deliver the preferred growth strategy.</p> <p>STR 6</p> <p>The Local Highway Authority conditionally supports this policy. The following amendments should be made:</p> <p>Paragraph 1 – “Continue to develop and provide an integrated strategic <i>walking and</i> cycling network in accordance with the latest Cycling Strategy and Local Cycling and Walking Infrastructure Plan...”</p> <p>Paragraph 8 - “Pursue improvements to <i>sustainable</i> transport links in the rural areas of the borough...”</p> <p>Paragraph 8, part f - “Ensure that transport infrastructure development or improvement schemes (including public realm and other works to historic routes, surfaces, and street furniture) take every opportunity to improve or enhance the historic environment, green, grey, and blue infrastructure, and landscape connectivity in accordance with the <i>relevant guidance</i>”</p> <p>Note: there is a reference to table 8 at the end of this policy text. Please see paragraph 6.511 comments to review commentary that has suggested removing this table from the Local Plan.</p>
			Public Rights of Way and Access Service	<p>As a general statement the Kent County Council Public Rights of Way (PRoW) and Access Service is keen to ensure that their interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. The team is committed to working in partnership with Local Councils to achieve the aims contained within the ‘Rights of Way Improvement Plan 2018 – 2028 (ROWIP)’ and contribute towards ‘Increasing Opportunities, Improving Outcomes: Kent County Council’s Strategic Statement (2015-2020)’. KCC seeks to promote the protection and enhancement of the network. As highway authority for the PRoW network, KCC is not seeking to have the planning system carry out those statutory duties which it performs under the various Acts</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>relating to PRoW. However, experience shows that local planning policy support for the work it does is very helpful in both protecting the network and negotiating enhancements to it, through new development.</p> <p>The proposed plan makes no reference to the County Council's Rights of Way Improvement Plan (ROWIP). The Borough has received significant benefits through the joint delivery of this strategic plan and its omission could result in significant loss of access to additional funding and opportunities. The Service therefore strongly urges the Borough to ensure that reference to the Plan is included. This will enable the successful joint partnership working to continue to deliver improvements to the Boroughs' PRoW network. ne</p> <p>The proposal to develop the cycle network and enhance Public Rights of Way (PRoW) for Non-Motorised Users (NMUs) is strongly supported.</p>
56	Section 4: The Development Strategy and Strategic Policies Place shaping and design	Policy STR 7	Highways and Transportation	The Local Highway Authority supports the policy.
			Provision and delivery of County Council Community Services	KCC supports the ethos of place shaping and design as laid out in paragraph 4.63 onwards and Policy STR 7, but would further request that appropriate reference is made to the Kent Design Guide.
			Heritage Conservation	The general commitment in this policy, to ensure that new development is well designed and is complementary to existing character, is welcomed. In attempting to "respond positively to local character" (clause 1) applicants and the Council should draw upon the Historic Landscape Characterisation for Tunbridge Wells that has been developed by the Council in partnership with the High Weald AONB Partnership and KCC. The characterisation identifies those landscape features that contribute to the historic character of the Borough such as tracks, lanes and field boundaries which can be incorporated in new development so that the new build fits into the grain of the existing settlements and landscape. Please see https://beta.tunbridgewells.gov.uk/local-plan/evidence/resources/environment-and-landscape/historic-landscape-characterisation-2017 for more details.
58	Section 4: The Development Strategy and Strategic Policies Conserving and enhancing the natural, built, and historic environment	Policy STR 8	Heritage Conservation	<p>This policy is welcomed, though it needs to be strengthened by including archaeological assets in the text. Archaeological assets are also heritage assets and constitute a key component in the Borough's historic environment providing a tangible connection with the Borough's more distant past.</p> <p>The provisions of clause 3 apply to all heritage assets, not just to proposals that impact on the landscape. As stated in the National Planning Policy Framework (NPPF), any development that impacts on heritage assets should be accompanied by a Heritage Statement and, where appropriate, by a desk-based assessment, possibly including the results of fieldwork. Such assessments should identify the impact on the heritage, consider methods for avoiding such impact and where the impact is unavoidable provide a clear justification. KCC is currently developing advice for applicants writing heritage statements and officers will be happy to forward it to the Borough Council in due course.</p>
			Public Rights of Way and Access Service	The development principle that prioritises the needs of pedestrians and cyclists is supported.
60	Section 4: The Development Strategy and Strategic Policies Limits to Built Development	Paragraph 4.82	Sustainable Urban Drainage Systems	Paragraph 4.82 - As Lead Local Flood Authority, KCC requests that the paragraph recognises all sources of flooding.
62	Section 4: The Development Strategy and Strategic Policies Limits to Built Development	Policy STR 10	Highways and Transportation	<p>The following sentence appears in many of the policies and is not acceptable to KCC Highways:</p> <p><i>It is expected that contributions will be required towards the following if necessary, to mitigate the impact of the development...</i></p> <p>The standard paragraph regarding contributions should be expressed as - <u><i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</i></u></p>
63	Section 5: Place Shaping Policies		Provision and Delivery of County Council Community Services	<p>Changing Places Where developments include community/village hall/sports hall provision by developers, KCC would welcome the inclusion of facilities for disabled users to meet the Changing Places specification.</p> <p>This can be found at: http://www.changing-places.org/</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary										
				<p><u>Youth services</u> The County Council notes the absence of references to youth services. There is a county wide need to make appropriate consideration for Youth Services, no less so in Tunbridge Wells – and youth services should clearly be seen as an essential element of the sustainable mix of community services. In general terms, there is a <i>'need for additional resources for youth services'</i>. In order to provide this service, s106 funding is much more usefully used to provide staffing/youth workers rather than capital for buildings as this is the way the Youth Service is now orientated.</p> <p>Specifically to Tunbridge Wells, KCC would like to see continued support for the channelling of funding towards multi-functional Cultural Hubs at Tunbridge Wells, Cranbrook and Southborough. These provide an excellent mix of services including social care, libraries and education facilities.</p>										
			Heritage Conservation	<p>The County Council has carried out an initial appraisal of sites within the Draft Local Plan considering conservation matters.</p> <p>The Preliminary Archaeological Assessment has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record, including early OS maps, aerial photographs and British Geological Society data. It is not a detailed appraisal but merely provides a broad initial view on the sensitivity of the archaeological resource and the way in which this should be approached for each of the options. The sensitivity of particular sites may change following more detailed appraisal and in light of new information. The process of assessment will be reviewed and refined as the Local Development Framework process continues.</p> <p>For each site, preliminary archaeological data, scale and notes are considered</p> <p>A crude 5 point scale has been used to rank the options with regard to archaeology. This is:</p> <p>Scale</p> <table data-bbox="1012 919 2605 1079"> <tr> <td>1</td> <td>Development of this site (or part of) should be avoided</td> </tr> <tr> <td>2</td> <td>Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</td> </tr> <tr> <td>3</td> <td>Significant archaeology could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>4</td> <td>Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>5</td> <td>No known archaeological potential on the site or part of it.</td> </tr> </table> <p>Note that for each described site several 'Scales' may be noted reflecting the varying potential across the site. For consideration of the site as a whole the lowest numerical 'Scale', i.e. that with the highest archaeological sensitivity, has been used.</p> <p>There are some sites which have major or sensitive archaeological issues. There are also some allocations for which KCC recommends either withdrawal on heritage grounds or that any decision for allocation needs to be supported by an Archaeological Deskbased Assessment (DBA). These sites include:</p> <p><u>AL/RTW 18 Land to the west of Eridge Road at Spratsbrook Farm Site Number 137</u> This allocation site contains the designated heritage asset of High Rocks hillfort; a Scheduled Monument of Iron Age date. The Scheduled Ancient Monument boundary focuses on the hillfort earthworks themselves but there is also high potential for associated remains to survive adjacent. In accordance with NPPF, there should be no impact on designated heritage assets and as such I recommend that this scheme is removed from allocations. If it is decided to proceed with decision to allocate, KCC recommends Historic England is consulted and a full Archaeological DBA is essential prior to finalising the decision.</p> <p><u>AL/RTW 6 Part of SALP AL/RTW 2A and Site Number 264 The Civic Complex - The Town Hall, Assembly Hall, and Police Station</u> This Site contains three designated heritage assets and Grade II listed buildings, therefore careful consideration of conservation issues is required, and advice should be sought from the relevant Conservation Officer. Archaeological issues are considered minimal, but if any groundworks some potential for post medieval.</p> <p><u>Tudeley Village: STR/CA 1 The Strategy for Capel Parish</u> Prior to allocation, this site requires a full Archaeological, Archaeological Landscape and Historic Building Assessment and a Geophysical Survey to locate any industrial remains close to All Saints Church Tudeley. There is high potential for significant archaeology to survive on this site, some of which may need to be preserved in situ. In addition, the impact on the historic settlement pattern of this area of Capel could be highly negative. The historic landscape in this area is complex and rural and the wider impacts of this scheme need to be thoroughly considered prior to any decision on allocation made.</p>	1	Development of this site (or part of) should be avoided	2	Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.	3	Significant archaeology could be dealt with through suitable conditions on a planning approval.	4	Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.	5	No known archaeological potential on the site or part of it.
1	Development of this site (or part of) should be avoided													
2	Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.													
3	Significant archaeology could be dealt with through suitable conditions on a planning approval.													
4	Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.													
5	No known archaeological potential on the site or part of it.													

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p><u>AL/CA 3 Land at Capel and Paddock Wood and AL/PW 1 Land at Capel and Paddock Wood</u> Site Numbers 142, 309, 310, 311, 312, 313, 314, 316, 317, 318, 319, 51,315, 402, 340, 347, 218, 220, 374, 79, 47, late site 26, 371, 344, 376, 212, 342</p> <p>Although this allocation site surrounds the existing modern town of Paddock Wood, it could have a major negative impact on the surrounding rural landscape. The scale and size of the allocation means major impacts on the surrounding land including the lanes, historic buildings, field boundaries and historic land use. Prior to allocation, KCC recommends an Archaeological DBA is undertaken to inform the process.</p> <p><u>AL/HO 3 Land to the east of Horsmonden Site Numbers 82, 108, 297, 324</u> This allocation site contains part of the Hawkhurst to Paddock Wood Hop Line, a railway specifically built to serve 19th and 20th century hop pickers. The site may also contain remnants of Horsmonden Station. The railway line and station are important local heritage assets and they should be preserved in situ and preferably conserved through a programme of heritage enhancement and interpretation. This allocation needs to be supported by a full Archaeological DBA and assessment of the railway heritage.</p> <p>Based on present information, all other sites or areas could be developed mostly with archaeological measures in place and in a number of cases as long as there is no impact on the setting of Listed Buildings and Conservation Areas (Scales 3, 4 and 5).</p> <p>As part of the decision making process on these Site Allocations, the County Council recommends the following reports are consulted as supporting information:</p> <ul style="list-style-type: none"> • Historic Towns Survey (Kent County Council/English Heritage) • Historic Parks and Gardens Survey (Tunbridge Wells BC/KCC/Kent Gardens Trust) • Farmstead Survey (English Heritage Jeremy Lake)
64	Section 5: Place Shaping Policies Royal Tunbridge Wells	Overview	Waste	KCC would wish to see the North Farm Waste Transfer Station and Household Waste and Recycling Centre included in the Overview Table, as it is a key piece of infrastructure that serves the whole of the District.
68	Section 5: Place Shaping Policies The Strategy for Royal Tunbridge Wells	Policy STR/RTW 1	Highways and Transportation	<p>Comments on sites mentioned in this policy are set out in individual policy comments.</p> <p>The County Council agrees with the 'Contributions required' introductory paragraph with the following alterations:</p> <p>“In order to mitigate the impact on infrastructure, for the development of sites allocated under Policies AL/RTW 1 to AL/RTW 32, and all other development within Royal Tunbridge Wells that creates a requirement for new or improved infrastructure beyond existing provision, <u>mitigation measures must be implemented by the developer to address that impact</u>, including for...”</p> <p>As Local Highway Authority, KCC considers paragraph a) to be acceptable but the particular reference to cycling amended as follows:</p> <p>“enabling means of active and sustainable <u>travel infrastructure</u>...”</p>
73	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Mount Pleasant car park, surgery in The Lodge, public toilets, Mount Pleasant Road, Calverley Grounds, Great Hall car park and Hoopers' car park/service yard	Policy AL/RTW 1	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following amendments are requested:</p> <p>Paragraph 4 - “Vehicular access/egress to/from the office and underground car park shall be via the northern Mount Pleasant Avenue/<u>Mount Pleasant Road junction</u>.”</p> <p>Paragraph 5 – “The theatre shall be serviced from Grove Hill Road, through Hoopers' car park/service yard. <u>The section of highway between 36 Mount Pleasant Road and the Great Hall Arcade shall be predominantly for pedestrian access to the development and Calverley Grounds...</u>”</p>
			Heritage Conservation	<p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p> <p>Potential for prehistoric remains and especially Post Medieval remains associated with spa town and designated landscape of Calverley Park. Remains associated with Calverley Park of particular sensitivity in heritage and archaeological landscape terms.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				Pre-determination heritage assessment essential including desk-based assessment (DBA) and fieldwork
75	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Royal Victoria Place Shopping Centre, Calverley Road	Policy AL/RTW 2	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>All servicing and delivery activity to be contained within the site boundary.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is potential for Post Medieval industrial heritage remains. An Archaeological DBA is recommended.
77	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Former Cinema Site, Mount Pleasant Road	Policy AL/RTW 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>All servicing and delivery activity to be contained within the site boundary.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval An Archaeological DBA is recommended.
79	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Torrington and Vale Avenue	Policy AL/RTW 4	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>All servicing and delivery bays to be contained within the site boundary.</u> This policy states that “Proposals must be informed by a Transport Assessment”. This does not feature in every policy. Either this should be removed and the requirement for a Transport Assessment be accepted throughout, or it should be repeated for all major site policies. The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is potential for Post Medieval industrial heritage remains. An Archaeological DBA is recommended which should include a review of the extent of previous groundworks. Site may be entirely truncated.
82	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre	Policy AL/RTW 5	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Cultural and Learning Hub (The Amelia Scott)			
84	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre The Civic Complex: the Town Hall, Assembly Hall Theatre, and Police Station	Policy AL/RTW 6	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Reference is to be made to parking requirements within the policy. For certain use classes it may not be suitable to rely solely on the town centre public car parks. The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Heritage Conservation	Scale 1 - Development of this site (or part of) should be avoided The site contains three designated heritage assets; Grade II listed buildings; careful consideration of conservation issues required and advice of Conservation Officer essential. Archaeological issues minimal but if any groundworks some potential for post medieval.
86	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Goods Station Road	Policy AL/RTW 7	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
88	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	Policy AL/RTW 8	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 3 - "Pedestrian access shall be provided through the site from west to east, providing a pedestrian link from Royal Wells Park to Rock Villa Road, and from there to Grosvenor Road and the town centre, <u>including improvements to the existing pedestrian network where required.</u> " Additional paragraph - <u>Vehicular access, delivery and servicing from Culverden Street.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The Site of Tunbridge Wells United Reformed Church which is a building highlighted as being of local importance. Potential for Post medieval remains. An Archaeological DBA is recommended.
90	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at 1 Meadow Road and 8 Upper Grosvenor Road	Policy AL/RTW 9	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>Consideration to be given to adequate space for congregation of pedestrians.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
92	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at the Auction House, Linden Park Road	Policy AL/RTW 10	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>All servicing and delivery activity to be contained within the site boundary.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Heritage and Conservation	Archaeological DBA is requested.
94	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Former Plant & Tool Hire, Eridge Road	Policy AL/RTW 11	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>All servicing and delivery activity to be contained within the site boundary.</u> Additional paragraph - <u>Suitable pedestrian links from the west to be provided.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
96	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land adjacent to Longfield Road	Policy AL/RTW 12	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 2 - “non-motorised route” should amended to read <u>non-motorised user (NMU) route.</u> Additional paragraph - <u>The Transport Assessment should communicate how the development would use sustainable transport principles to minimise additional vehicular trips on the network.</u> Additional paragraph - <u>The Developer will be required to consider the impact of this development on the wider road network, such as the A21 junctions at Pembury and Tonbridge.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Public Rights of Way and Access Service	The County Council requests that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site has potential for prehistoric and post medieval remains. A prehistoric trackway may survive at northern end and evidence of ridge and furrow to the south. Site also may contain remnants of designed landscape associated with Colebrooke. Archaeological and Archaeological Landscape Assessment essential with fieldwork potentially also required.
99	Section 5: Place Shaping Policies Allocation policies for Royal	Policy AL/RTW 13	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested:

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Tunbridge Wells Town Centre Land at Colebrook House, Pembury Road			Paragraph 2 - “non-motorised route” should amended to read <u>non-motorised user (NMU) route</u> Additional paragraph - <u>The Transport Assessment should communicate how the development would use sustainable transport principles to minimise additional vehicular trips on the network.</u> Additional paragraph - <u>The developer will be required to consider the impact of this development on the wider road network, such as the A21 junctions at Pembury, North Farm and Tonbridge.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Public Rights of Way and Access Service	The County Council requests that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is potential for archaeology, historic structures and archaeological landscape features associated with Colebrooke, post medieval residence. DBA is requested to better inform decisions.
101	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at the former North Farm landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate	Policy AL/RTW 14	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>The Transport Assessment should communicate how the development would use sustainable transport principles to minimise additional vehicular trips on the network.</u> Additional paragraph - <u>The developer will be required to consider the impact of this development on the wider road network, such as the A21 junctions at Pembury, North Farm and Tonbridge.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Public Rights of Way and Access Service	The County Council requests that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	Scale 5 - No known archaeological potential on the site or part of it.
103	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Knights Park	Policy AL/RTW 15	Highways and Transportation	The Local Highway Authority conditionally supports this policy. There is concern about loss of parking on this site in order to develop further A3 uses. It is requested that something is included in the policy to ensure this is a key consideration. The County Council as Local Highway Authority is also considering this (with Arriva) as a potential Park and Ride site owing to parking for leisure related uses being mostly during evenings and car park being relatively free during office hours. The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
105	Section 5: Place Shaping	Policy AL/RTW	Highways and	The Local Highway Authority conditionally supports this policy.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Wyevale Garden Centre, Eridge Road	16	Transportation	<p>The following changes are requested:</p> <p>Paragraph 8 – “Means of access, including secondary/emergency access, to be <u>informed by a Transport Assessment: it is likely that the scale of any development may be limited by quality of access arrangements that can be achieved within the confines of the site. There is a crash record at the access junction and the railway bridge affects visibility to the west when exiting. An emergency access is likely to be required to the north. Pedestrian and cycle access into the town requires improvement.</u>”</p> <p>Additional paragraph: <u>Provision of pedestrian and cycle access to the north.</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u></p>
			Public Rights of Way and Access Service	KCC supports the specific policy reference to PRoW (Statement 4), including the provision of an east-west green route and new connections with the existing PRoW network.
			Heritage Conservation	<p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p> <p>The site lies south of Nevill Park and east of High Rocks Iron Age hillfort and is in an archaeologically sensitive area. Predetermination DBA and fieldwork is required to be carried out.</p>
107	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at 36-46 St John's Road	Policy AL/RTW 17	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Additional paragraph: <u>All servicing and delivery activity to be contained within the site boundary.</u></p> <p>Additional paragraph. <u>Principal vehicular access from Woodbury Park Road.</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u></p>
109	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land to the west of Eridge Road at Spratsbrook Farm	Policy AL/RTW 18	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 2 – “Links from the site to be provided to the existing public footway network in the vicinity of the site and cycle and pedestrian links between the site, the adjacent Ramslye estate <u>and into the town centre and train station.</u>”</p> <p>Additional paragraph: <u>Improved public transport links are required to serve the residential aspect and the secondary school. Provision of a bus only link between the school site and Ramslye Road.</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate.</u></p>
			Public Rights of Way and Access Service	KCC supports the specific policy reference to PRoW in paragraph 2, as new path links would be a valuable addition to the existing PRoW network. However, attention is drawn to the railway line along the northern boundary of the site, which currently acts as a barrier to north-south movements. Consideration should be given to policy measures that can address this barrier and improve connectivity with the surrounding PRoW network.
			Heritage Conservation	<p>Scale 1 - Development of this site (or part of) should be avoided</p> <p>Site contains designated heritage asset of High Rocks hillfort and Scheduled Monument of Iron Age date. Associated remains are likely to survive on this</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>site and there is potential for early prehistoric remains.</p> <p>The County Council from a heritage perspective would prefer that this site is removed from allocations.</p> <p>Archaeological DBA essential. The County Council considers that safeguarding measures are needed to ensure no impact on the Scheduled Ancient Monument. Historic England must be consulted and predetermination works essential.</p>
111	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at 77 Mount Ephraim (Sturge House, Brockbourne House)	Policy AL/RTW 19	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following change is requested:</p> <p>The standard paragraph regarding contributions should also feature in this policy - <u><i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i></u></p>
			Heritage Conservation	<p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p> <p>The site is within the grounds of Oakhurst, post medieval residence including designed formal gardens. Assessment of remaining historic landscape required.</p>
113	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	Policy AL/RTW 20	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The address should be Underwood Rise, not Broadwater Down.</p> <p>The following changes are requested:</p> <p>Paragraph 1 - "Provision of pedestrian link between <u><i>Broadwater Lane</i></u> and Linden Garden;"</p> <p>The standard paragraph regarding contributions should also feature in this policy - <u><i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i></u></p> <p>The County Council notes that the site does not appear to abut the public highway: access section of Underwood Rise and Linden Gardens are private roads.</p>
			Heritage Conservation	<p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p> <p>Some archaeological potential for post medieval railway/industrial heritage remains requires further archaeological assessment.</p>
115	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Culverden Stadium, Culverden Down	Policy AL/RTW 21	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>The existing vehicular and pedestrian access to site inadequate (Note re paragraph 5: Pillars are at entrance to adjacent site)</p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
117	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre	Policy AL/RTW 22	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>There is no footway either side of Bayham Road. KCC as the Local Highway Authority cannot support allocation without significant work to provide footway along Bayham Road or to provide alternative footway link to highway network.</p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Land at Bayham Sports Field West			
119	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land to the north of Hawkenbury Recreation Ground	Policy AL/RTW 23	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 1 – “Development shall implement schemes/contribute <u>to schemes</u> to make substantial improvements to local road junctions and crossings within the immediate area, and to other traffic or sustainable transport measures; to <u>include the access junction with High Woods Lane, High Woods Lane/Halls Hole Road, Halls Hole Road/Forest Road, Halls Hole Road/ A264 Pembury Road (and/or contribution to junction improvement investigation/implementation on A264 Pembury Road) (see Policies TP1: Transport Assessments, Travel Plans and Mitigation and TP2: Transport Design and Accessibility)”</u></p> <p>Additional paragraph - <u>Widening of High Woods Lane to the west of the site access from single-way working to cater for additional trips.</u></p> <p>Additional paragraph - <u>Provision of overspill parking area.</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
121	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Cadogan Sports Field, St John's Road	Policy AL/RTW 24	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>The existing vehicular and pedestrian access to site are inadequate.</p>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
123	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Colebrook Sports Field, Liptraps Lane	Policy AL/RTW 25	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 2 – “Opportunities to be explored for improving pedestrian and cycle access onto Dowding Way <u>and creating a new vehicular link between Dowding Way and Clifton Road”</u></p> <p>Additional paragraph - <u>Safeguard land to the west of the site for possible future pedestrian/cyclist/vehicular link between Dowding Way to Clifton Road.</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
125	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre	Policy AL/RTW 26	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Additional paragraph - <u>Position of new vehicular and pedestrian access points to be determined through a Transport Assessment.</u></p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Land at Cemetery Depot, Benhall Mill Road			<p>Additional paragraph - <u>Provision of adequate visibility splays within site and/or highway land (again see criterion 5 of Policy EN 1: Design and other development management criteria</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
127	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Hawkenbury, off Hawkenbury Road/Maryland Road	Policy AL/RTW 27	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Additional paragraph - <u>Development shall deliver/contribute to substantial improvements to local road junctions and crossings within the immediate area, and to other traffic or sustainable transport measures; to include contribution to junction improvement investigation/implementation on A264 Pembury Road (see Policies TP1: Transport Assessments, Travel Plans, and Mitigation and TP2: Transport Design and Accessibility.</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Heritage and Conservation	<p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p> <p>Site has high potential for remains associated with a late 19th to early 20th century community associated with the brickworks. Some of brickworks survive at depth. Previous archaeological works undertaken should be consulted for reference</p>
129	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Rowan Tree Road, Showfields Road	Policy AL/RTW 28	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Additional paragraph- <u>Development needs to address operational parking and servicing.</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
131	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at former Gas Works, Sandhurst Road	Policy AL/RTW 29	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 2 –“Transport improvements: development shall <u>deliver/contribute</u> to transport improvements, to include improvements to road junctions and crossings adjacent to the site and within the surrounding area, as informed by Transport Assessments (see Policies TP 1: Transport Assessments, Travel Plans, and Mitigation and TP 2: Transport Design and Accessibility)”</p> <p>Paragraph 4 - <u>Improvements to vehicular, cycle, and pedestrian links under the railway line at Sandhurst Road/Upper Grosvenor Road junction</u></p> <p>The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Heritage and Conservation	<p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p> <p>Potential for post medieval industrial heritage. Some assessment of archaeology needed.</p>
133	Section 5: Place Shaping Policies	Policy AL/RTW 30	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Allocation policies for Royal Tunbridge Wells Town Centre Land at Medway Road			The following changes are requested: Additional paragraph - <u>Parking, deliveries and drop off to be accommodated from Medway Road.</u> The standard paragraph regarding contributions should also feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
135	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at 123-129 Silverdale Road	Policy AL/RTW 31	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
137	Section 5: Place Shaping Policies Allocation policies for Royal Tunbridge Wells Town Centre Land at Beechwood Sacred Heart School	Policy AL/RTW 32	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage and Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval Potential for remains associated with post medieval residence and designed landscape. Some archaeological assessment needed.
142	Section 5: Place Shaping Policies Southborough The Strategy for Southborough	Policy STR/SO 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. Comments on sites mentioned in this policy are set out in individual policy comments. The following changes are requested: Paragraph - "Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> , public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility" The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	KCC supports and welcomes the specific reference to PRow in paragraph 8.
145	Section 5: Place Shaping Policies Allocation policies for Southborough Southborough Hub, London Road	Policy AL/SO 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>The development shall incorporate a segregated cycle route between The Ridgeway and the A26 London Road at which point a toucan crossing shall be implemented by the developer.</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				KCC notes that the policy does not feature “Proposals must be accompanied by a Transport Assessment”. Either all large sites should state this, or none of them (in which case it would be taken for granted that a Transport Assessment is required).
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval Very high potential for Mesolithic and Neolithic remains. Also potential for post medieval remains associated with Bell Inn PH identifiable of 1st Ed OS map. Predetermination Archaeological DBA is required.
147	Section 5: Place Shaping Policies Allocation policies for Southborough Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	Policy AL/SO 2	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 1 – “Vehicular access from Bright Ridge” The standard paragraph regarding contributions should feature in this policy - <i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
149	Section 5: Place Shaping Policies Allocation policies for Southborough Land at Mabledon and Nightingale	Policy AL/SO 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 1 – “Provision of safe and acceptable access arrangements from the A26 for the proposed development with, where required, a <u>secondary/emergency</u> access” Paragraph 2 – “Provision of safe and accessible pedestrian and cycle linkages <u>including crossing points</u> to Southborough and Tonbridge (see Policy TP 2: Transport Design and Accessibility)” The standard paragraph regarding contributions should feature in this policy - <i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
152	Section 5: Place Shaping Policies Allocation policies for Southborough Land at Mabledon House	Policy AL/SO 4	Highways	The Local Highway Authority conditionally supports this policy. The following changes are requested: 8. “ <u>Provision of safe and accessible pedestrian and cycle linkages and crossing points</u> to Southborough and Tonbridge...” The standard paragraph regarding contributions should feature in this policy - <i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i>
			Public Rights of Way and Access Service	KCC supports and welcomes the specific reference to PRow in paragraphs 6 and 7
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Potential for late post medieval remains associated with Mabledon House and park
156	Section 5: Place Shaping	Policy STR/CA 1	Highways and	The Local Highway Authority conditionally supports this policy

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Policies Capel (including Tudeley Village) The Strategy for Capel Parish	Policy AL/CA 1	Transportation	<p>Paragraph 6 of Strategy for Capel lists destinations to provide strategic transport links to. It should possibly include destinations to the north (Maidstone, Kings Hill, M20). Further work is required to assess this. KCC recommends this paragraph begins with the following statement: <u>Strategic transport links and junctions shall be provided/improved between....</u></p> <p>Further additional changes are requested:</p> <p>Paragraph 6 – “Strategic transport links <u>and junctions</u> shall be provided/<u>improved</u> between Tonbridge, Tudeley Village, the A228, Five Oak Green, Royal Tunbridge Wells/Southborough, <u>destinations to the north in Tonbridge & Malling and Maidstone boroughs</u>, land at Capel and Paddock Wood and Paddock Wood Town Centre. To include the provision of an offline A228 strategic link. <u>The exact location of such a link has not been determined</u>. Links from Tudeley Village to the east should minimise the impact on the road network in the settlement of Five Oak Green and have regard to Kent County Council minerals allocations in the vicinity. <u>The exact location of such a link has not been determined</u>”</p> <p>Additional paragraph – <u>Strategic sustainable transport infrastructure (dedicated public transport routes, segregated footways and cyclerooutes) shall be provided/improved between Tonbridge, the proposed secondary school, Tudeley Village, Paddock Wood and Tunbridge Wells</u></p> <p>Additional paragraph - <u>Provision of improved vehicle and cycle parking at Paddock Wood station and Tonbridge Station.</u></p> <p>Additional paragraph - <u>Opportunities will be explored for a train station at Tudeley Village on the Southeastern Main Line route. If deemed suitable developers will deliver through contributions. If deemed possible for construction in the future, land will be safeguarded.</u></p>
			Education	<p>Proposed growth within Paddock Wood and Tudeley Village is forecast to generate the combined need for an additional eight forms of entry of secondary provision. It is proposed two forms of entry are provided through the expansion of the existing Mascalls School prior to the establishment of a new 6FE secondary school within the area. The total level of growth cannot be accommodated through the expansion of Mascalls alone and therefore Policy STR/PW 1 relating to growth in Paddock Wood must reflect the need for sites relating to the policy to contribute financially to the provision of the new 6FE secondary school.</p>
			Heritage Conservation	<p>Scale 1 - Development of this site (or part of) should be avoided</p> <p>Major heritage issues to consider, especially impact on historic landscape. There are many designated heritage assets directly adjacent or perhaps within this site, farmsteads and church. There is a potential sensitive WWII crash site as well, with high potential for as yet unknown significant archaeological remains. Proposed Tudeley Village has potential for multi-period remains. It has not been subject to detailed formal archaeological investigations and as such KCC's understanding of the heritage of this site is limited. Factors KCC are aware of include: potential for early prehistoric in the River Terrace Gravels; on topographical grounds there is potential for later prehistoric; 13th century or earlier community focused around the church with some bloomeries identified to the north; post medieval farmsteads and small industrial complexes; WWII crash site near Bank Farm</p> <p>Prior to allocation, this site requires a full Archaeological, Archaeological Landscape and Historic Building Assessment; a Geophysical Survey to locate any industrial remains close to All Saints Church Tudeley.</p> <p>In addition, the impact on the historic settlement pattern of this area of Capel could be very high.</p> <p>The historic landscape in this area is of considerable importance with a strong horticultural and post medieval industrial character. Given the size of this proposed development scheme, there is a need for detailed consideration of the impact on the surrounding historic landscape, including nearby villages, key historic buildings, sensitive archaeological landscapes, including lanes, field boundaries and historic land use features.</p>
160	Section 5: Place Shaping Policies Allocation policies for Capel Parish Tudeley Village		Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 2 (Transport bulletpoint) – “Integrated, forward looking, and accessible transport options that support economic prosperity, wellbeing for residents, <u>and aim to minimise use of the private car</u>. This should include the <u>early integration and</u> promotion of public transport, walking, and cycling (<u>following PTOD principles</u>) so that settlements are easy to navigate, and facilitate simple and sustainable access to jobs, education, and services”</p> <p>PTOD is Public Transport Orientated Design i.e. putting PT at the fore of the masterplanning process to ensure buses, trains (if applicable) and</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>cycling/walking are well planned for and do not need to be retro fitted which is an impossible task</p> <p>Paragraph 5 - reference to be included to PTOD principles to ensure early planning of key transport corridors within the sites and vicinity, and further assessment of possible highway network improvements</p> <p>Paragraph 9 – “Transport provision shall be delivered on a strategic basis, taking account of the impact of proposed development at land at Capel and Paddock Wood, with transport infrastructure links between Paddock Wood, Tudeley Village, Tonbridge, and Royal Tunbridge Wells. A key element will be determining the most appropriate route to link to the road network to the east, which shall minimise the impact on the existing highway network through Five Oak Green, and should seek to reduce traffic levels through this settlement, and have regard to Kent County Council minerals allocations in the vicinity and sensitive receptors such as Capel Primary School. <u>Developers will be required to provide (or contribute towards - depending on the success of additional funding bids) the potential offline A228 strategic link, the eastward link to the A228; and all other associated highway and sustainable transport infrastructure required to mitigate the impact of development resulting from this allocation</u>”</p>
			Public Rights of Way and Access Service	<p>Paragraphs 2 and 10 are supported, but there is no reference to PRoW within the policy text. KCC considers reference should be made considering the scale of the proposed development and the existence of the PRoW that pass through the identified sites. It should be expected that the PRoW network will be positively accommodated within the development and enhanced. The creation of new path links should also be considered, to provide ample opportunities for active travel and outdoor recreation. Additional text should be inserted into the policy text to stipulate this requirement.</p>
164	Section 5: Place Shaping Policies Allocation policies for Capel Parish Land to east of Tonbridge/west of site for Tudeley Village	Policy AL/CA 2	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 3 - “Suitable provision shall be made for <u>vehicular, pedestrian and cycle</u> access into <u>and through</u> the site, <u>and between the northern and southern parcels of land.</u>”</p> <p>Additional paragraph - <u>Vehicular access to be informed by a Transport Assessment</u></p> <p>Additional paragraph - <u>Development shall provide improvements to local road junctions and pedestrian footway crossings, and to other traffic or sustainable transport measures</u></p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Education	<p>This policy relates to land proposed for the establishment of a new 6FE secondary school. The establishment of a new school is wholly required to support the proposed level of growth. It would be advantageous for the school to be located closer to the proposed development towards the East; this would increase the likelihood of more sustainable modes of travel being used by students. However, the geographic location of the school is acceptable in order to meet the additional need for school places.</p> <p>The identified site is significantly constrained consisting of two sites separated by a railway line with deep embankments, the southerly part of the site contains a sizeable area of Ancient Woodland, a high pressure gas pipeline runs from south to north through the western side of the site and the south of the site is identified as an area of potential archaeological importance.</p> <p>It is not preferable to establish a new school on split sites and the site’s additional constraints are likely to make design and construction of a new secondary school far more challenging. The maintenance and management of the ancient woodland could not be the responsibility of the school. Nor could the maintenance of the bridge that crosses the railway line; however the school would require security that the bridge will be maintained in perpetuity and there is potential that a second bridge over the railway would be required within the school site to overcome some of the site’s constraints; this would enable students to cross the two sites without leaving the safeguarding line of the school during the school day.</p> <p>Delivery of a secondary school at this location is therefore highly likely to cost significantly more than that of a regularly shaped and unconstrained single site; the school will need to be wholly funded by development and therefore the financial contributions from contributing developments would need to be increased to cover the additional costs derived from both the site’s abnormalities and the likely need to deviate from the DfE’s baseline design. In order for the County Council to confirm that the necessary secondary provision could be provided within the proposed site it is suggested that prior to Regulation 19, the Borough Council undertakes a detailed design and costing exercise relating to the site or that an alternative site with fewer physical constraints is identified within the area.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Public Rights of Way and Access Service	Attention is drawn to the existence of Public Footpath WT163, which connects the two sites. Whilst this right of way is highlighted within paragraph 5.6.1, Policy AL/CA 2 makes no reference to this path, which would increasingly serve as a sustainable transport link. Additional text should therefore be inserted into this policy, requesting that enhancements are made to this right of way, in preparation for the expected increase in use. Consideration should also be given to upgrading the status of this route, to enable access for cyclists and equestrians.
			Heritage Conservation	Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. Potential for significant archaeology including industrial landscape features and buried archaeology. The site lies in an area of complex geology with gravels and head deposits along a river valley, which is favourable for prehistoric and later industrial and settlement activity. There is Postern Forge within the northern part of the north site and there are designated historic farm complexes adjacent with associated historic farmland and field boundaries.
166	Section 5: Place Shaping Policies Allocation policies for Capel Parish Land at Capel and Paddock Wood	Policy AL/CA 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 2 (Transport bulletpoint) – “integrated, forward looking, and accessible transport options that support economic prosperity, wellbeing for residents, <i>and aim to minimise use of the private car.</i> This should include the <i>early integration and</i> promotion of public transport, walking, and cycling (<i>following PTOD principles</i>) so that settlements are easy to navigate, and facilitate simple and sustainable access to jobs, education, and services” The policy should also include reference to PTOD feasibility to ensure early planning of key transport corridors within the sites and vicinity, and further assessment of possible highway network improvements. Paragraph 9. “Transport provision shall be delivered on a strategic basis, taking account of the impact of proposed development at land at Capel and Paddock Wood, with transport infrastructure links between Paddock Wood, Tudeley Village, Tonbridge, and Royal Tunbridge Wells. A key element will be determining the most appropriate route to link to the road network (A228 and beyond) to the east of Tudeley village, which shall minimise the impact on the existing highway network through Five Oak Green, and should seek to reduce traffic levels through this settlement, and have regard to Kent County Council minerals allocations in the vicinity and sensitive receptors such as Capel Primary School. <i>Developers will be required to provide (or contribute towards - depending on the success of additional funding bids) the potential offline A228 strategic link, the link between Tudeley village and the A228; and all other associated highway and sustainable transport infrastructure required to mitigate the impact of development resulting from this allocation</i> ”
			Public Rights of Way and Access Service	Paragraphs 2 and 10 are supported, but there is no reference to PRow within the Policy text. KCC recommends reference is made in consideration of the scale of the proposed development and the existence of the PRow that pass through the identified sites. It should be expected that the PRow network will be positively accommodated within the development and enhanced. The creation of new path links should also be considered, to provide ample opportunities for active travel and outdoor recreation. Additional text should be inserted into the policy text to stipulate this requirement.
			Heritage Conservation	Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. This site is a composite site surrounding Paddock Wood. There is potential for prehistoric remains in the River Terrace Gravels and there is potential for prehistoric and later activity along the river channels. This area is known to have been utilised in the Medieval and Post Medieval Periods for industrial activity. There are many historic farm holdings in the area some of which are moated complexes suggesting medieval origins. The historic landscape in this area is of considerable importance with a strong horticultural and post medieval industrial character. Given the size of this proposed development scheme, there is a need for detailed consideration of the impact on the surrounding historic landscape, including nearby villages, key historic buildings, sensitive archaeological landscapes, including lanes, field boundaries and historic land use features. Prior to allocation of this site, there needs to be a thorough Archaeological, Historic Buildings and Archaeological Landscape DBA and fieldwork.
170	Section 5: Place Shaping Policies	Policy STR/PW 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested:

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Paddock Wood The Strategy for Paddock Wood			<p>Paragraph 5 of 'Strategy for Paddock Wood' lists destinations to provide strategic transport links to. KCC recommends this should include destinations to the north (Maidstone, Kings Hill, M20). Further work is required to assess this. KCC recommends the paragraph opens with the following: <u>'Strategic transport links and junctions shall be provided/improved between....'</u></p> <p>Paragraph 5 – "Strategic transport links and junctions shall be provided/improved between Tonbridge, Tudeley Village, the A228, Five Oak Green, Royal Tunbridge Wells/Southborough, <u>destinations to the north in Tonbridge & Malling and Maidstone boroughs</u>, land at Capel and Paddock Wood and Paddock Wood Town Centre. This will include the provision of an offline A228 strategic link. <u>The exact location of such a link has not been determined</u>. Links from Tudeley Village to the east (into the centre of Paddock Wood) should minimise the impact on the road network in the settlement of Five Oak Green and have regard to Kent County Council minerals allocations in the vicinity. <u>The exact location of such a link has not been determined</u>"</p> <p>Additional paragraph - <u>Developers to implement improvements to road junctions and links in the town centre (subject to further assessment during the masterplanning exercise).</u></p> <p>Additional paragraph - <u>Strategic sustainable transport infrastructure (dedicated public transport routes, segregated footways and cyclist routes) shall be provided/improved between Tonbridge, the proposed secondary school, Tudeley Village, Paddock Wood and Tunbridge Wells.</u></p> <p>Additional paragraph- <u>Opportunities will be explored for a train station at Tudeley Village on the Southeastern Main Line route. If deemed suitable developers will deliver through contributions. If deemed possible for construction in the future, land will be safeguarded</u></p>
			Education	Proposed growth within Paddock Wood and Tudeley Village is forecast to generate the combined need for an additional eight forms of entry of secondary provision. It is proposed two forms of entry are provided through the expansion of the existing Mascalls School prior to the establishment of a new 6FE secondary school within the area. The total level of growth cannot be accommodated through the expansion of Mascalls alone and therefore Policy STR/PW 1 relating to growth in Paddock Wood must reflect the need for sites relating to the policy to contribute financially to the provision of the new 6FE secondary school.
			Public Rights of Way and Access Service	While the proposals within the Transport section of this Policy are supported, there is no specific reference to PRoW. KCC recommends that PRoW is referenced considering the scale of the proposed development and the existence of the PRoW that pass through the identified sites. It should be expected that the PRoW network will be positively accommodated within the development and enhanced. The creation of new path links should also be considered, to provide ample opportunities for active travel and outdoor recreation. Additional text should be inserted into the policy text to stipulate this requirement.
175	Section 5: Place Shaping Policies Allocation policies for Paddock Wood Land at Capel and Paddock Wood	Policy AL/PW 1 and AL/PW 1 Table 4	Highways and Transportation	<p><u>Table 4</u></p> <p>The Local Highway Authority conditionally supports this table and provides the following comments on Highways/Sustainable transport sections for individual sites:</p> <p>Parcel 1- Optimum access point/s should be decided as part of the masterplanning - not at this stage. Dedicated bus route through site could be a result of masterplanning exercise, plus segregated footway/cycleway routes.</p> <p>Parcel 2 - Optimum access point/s should be decided as part of the masterplanning - not at this stage. Dedicated bus route through site could be a result of masterplanning exercise, plus segregated footway/cycleway routes.</p> <p>Parcel 3 - Optimum access point/s should be decided as part of the masterplanning - not at this stage. Dedicated bus route through site could be a result of masterplanning exercise, plus segregated footway/cycleway routes. Pedestrian permeability vital for potential Primary School site.</p> <p>Parcel 4 - Optimum access point/s should be decided as part of the masterplanning - not at this stage. Dedicated bus route through site could be a result of masterplanning exercise, plus segregated footway/cycleway routes. Assessment of junction has not been undertaken, and reference to this should be removed. Assessment should take place as part of masterplanning exercise.</p> <p>Parcel 5 - Optimum access point/s should be decided as part of the masterplanning - not at this stage. Dedicated bus route through site could be a result of masterplanning exercise, plus segregated footway/cycleway routes. For this parcel, the 'Use' is down as ED, but housing is subsequently</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>mentioned. Different transport requirements: will need further defining at Masterplanning stage.</p> <p>Parcel 6 - Optimum access point/s should be decided as part of the masterplanning - not at this stage. For this parcel, the 'Use' is down as ED, but housing is subsequently mentioned. Likely to be unsuitable for housing from a transport perspective: remote from town and key facilities owing to location between two railway tracks.</p> <p>Parcel 7 - Optimum access point/s should be decided as part of the masterplanning - not at this stage. Dedicated bus route through site could be a result of masterplanning exercise, plus segregated footway/cycleway routes. Assessment of junction has not been undertaken, and reference to this should be removed. Assessment should take place as part of masterplanning exercise.</p> <p>Parcel 8 - Assessment of junction has not been undertaken, and reference to this should be removed. Assessment should take place as part of masterplanning exercise.</p> <p>Parcel 9 - Optimum access point/s should be decided as part of the masterplanning - not at this stage. Dedicated bus route through site could be a result of masterplanning exercise, plus segregated footway/cycleway routes - especially if developed as a neighbourhood centre. Assessment of junctions/widening have not been undertaken, and reference to this should be removed. Assessment should take place as part of masterplanning exercise.</p> <p>Parcel 10 - Assessment of junction has not been undertaken, and reference to this should be removed. Assessment should take place as part of masterplanning exercise.</p> <p>Parcel 11 - No built development proposed. Assessment of junction has not been undertaken, and reference to this should be removed. Assessment should take place as part of masterplanning exercise.</p> <p>Parcel 12 - For this parcel, the 'Use' is down as School Expansion Only, but housing is subsequently mentioned. Unlikely that school access could be jointly used for residential access.</p> <p><u>Policy AL/PW 1</u></p> <p>The following changes are requested:</p> <p>Paragraph 2 - “Transport – integrated, forward looking, and accessible transport options that support economic prosperity, wellbeing for residents, and aim <i>to minimise use of the private car</i>. This should include the <i>early integration and promotion of public transport, walking, and cycling (following PTOD principles) so that settlements are easy to navigate, and facilitate simple and sustainable access to jobs, education, and services.</i></p> <p>Reference should also be made to PTOD principles to ensure early planning of key transport corridors within the sites and vicinity, and further assessment of possible highway network improvements.</p> <p>Paragraph 9 – “Transport provision shall be delivered on a strategic basis, taking account of the impact of proposed development at land at Tudeley Village, with transport infrastructure links between Paddock Wood, Tudeley Village, Tonbridge, and Royal Tunbridge Wells. A key element will be determining the most appropriate route to link to the road network to the east, which shall minimise the impact on the existing highway network through Five Oak Green, and should seek to reduce traffic levels through this settlement, and have regard to Kent County Council minerals allocations in the vicinity and sensitive receptors. <u>Developers will be required to fund and construct the potential offline A228 strategic link, the eastward link to the A228; and all other associated highway and sustainable transport infrastructure required to mitigate the impact of development resulting from this allocation”</u></p> <p>Paragraph 10 – “A strategic approach to increase walking and cycling permeability <u>that is accessible to all and permeable by all modes</u> will be included in the masterplanning (see Policy TP 2: Transport Design)”</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Public Rights of Way and Access Service	The County Council recommends tha considering the scale of the proposed development and the existence of the PRoW that pass through the proposed development sites, reference should be made to PRoW within this policy. It should be expected that the PRoW network will be positively accommodated within the development and enhanced. The creation of new path links should also be considered, to provide ample opportunities for active travel and outdoor recreation. Additional text should be inserted into the policy text to stipulate this requirement.
			Heritage and Conservation	<p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p> <p>This site is a composite site surrounding Paddock Wood and there is potential for prehistoric remains in the River Terrace Gravels and there is potential for prehistoric and later activity along the river channels. This area is known to have been utilised in the Medieval and Post Medieval Periods for industrial activity. There are many historic farm holdings in the area some of which are moated complexes suggesting medieval origins.</p> <p>The historic landscape in this area is of considerable importance with a strong horticultural and post medieval industrial character. Given the size of this proposed development scheme, there is a need for detailed consideration of the impact on the surrounding historic landscape, including nearby villages, key historic buildings, sensitive archaeological landscapes, including lanes, field boundaries and historic land use features.</p> <p>Prior to allocation of this site, there needs to be a thorough Archaeological, Historic Buildings and Archaeological Landscape DBA and fieldwork.</p>
				The County Council would like to ensure that there is an adequate supply of open space across Tunbridge Wells, including at Paddock Wood. Studies have shown that green spaces provide considerable health and well-being benefits for the public, but it is acknowledged that these spaces are facing increasing pressures from new developments and a growing population. There is a risk that the attractive qualities of green spaces will deteriorate unless appropriate steps are put in place to protect the sites and manage access. To cope with the increasing demands of a growing population, it is recommended that Local Plan ensures that adequate green open spaces are provided across the borough.
190	Section 5: Place Shaping Policies Allocation policies for Paddock Wood Paddock Wood Town Centre	Policy AL/PW 2	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>This policy requires a reference to public transport improvements. If aspirations for a dedicated bus route from the wider area are to be realised, this allocation is the prime destination for Paddock Wood Station and town centre. This may require new hub for buses, bus lanes, improved pedestrian crossing facilities etc, subject to masterplanning exercise.</p> <p>Additional paragraph - <u>The masterplan shall include a servicing strategy.</u></p>
			Heritage Conservation	<p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p> <p>The site contains a designated war memorial and a sensitive WWII crash site. In addition there are likely to be post medieval industrial remains.</p> <p>The station and a small holding are identifiable on the 1st Ed. OS map and remnants may survive and could be of local heritage importance.</p> <p>This town centre scheme should be informed by a full Heritage Assessment to inform details of the scheme.</p>
192	Section 5: Place Shaping Policies Allocation policies for Paddock Wood Land at Mascalls Farm	Policy AL/PW 3	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Additional paragraph - <u>In line with planning permission and legal agreements relating to application 17/03480 for 309 units, major/minor (depending on various growth scenarios) improvements to the Badsell Road/Maidstone Road/Mascalls Court Road junction and the Colts Hill roundabout are to be partly funded by this site. A Transport Assessment to consider additional trips in relation to proposals beyond 309 units will be required, and further contributions may be required. However, this junction will be assessed further as part of the masterplanning exercise and any additional costs should be shared with other developers.</u></p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				Last paragraph – “In addition to contributions towards the Foal Hurst Wood Local Nature Reserve to address the need for ecological mitigation, <u>delivery of schemes/contributions towards schemes</u> will be sought to mitigate the impact on transport...”
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval This site contains evidence of medieval and later activity and there is a known WWII crash site which needs to be dealt with considerately. Archaeological Assessment works have taken place but not been completed. Reference to the findings of the previous archaeological works is essential to inform this development
194	Section 5: Place Shaping Policies Allocation policies for Paddock Wood Land at the Memorial Field, west of Maidstone Road	Policy AL/PW 4	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: <u>Additional paragraph: Improvements to the access will be required to cater for the additional trips associated with the proposed development. The entrance should be wide enough for two vehicles to pass. Appropriate levels of parking to be provided.</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site has potential for prehistoric and later remains but especially post medieval remains. There are several designated historic buildings around the site. Archaeological DBA would be useful to inform details of the proposals.
199	Section 5: Place Shaping Policies Cranbrook and Sissinghurst The Strategy for Cranbrook and Sissinghurst Parish	Policy STR/CRS 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested Paragraph 3 - “All development proposals will be required to establish the impact of the proposed development upon the <u>Hawkhurst crossroads junction (A229/A268) and the Flimwell crossroads junction (A21/A268)</u> ” Paragraph 7 - “Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> , public rights of way and the local strategic cycle network..” <u>Additional paragraph - The impact of the development in Cranbrook on the Hawkhurst junction is a concern. However, a blanket objection by the Local Highway Authority to all residential allocations in Cranbrook would be unsuitable owing to the likelihood of the majority of traffic from each site heading north rather than south on the A229.</u>
			Public Rights of Way and Access Service.	The specific reference to PRoW in paragraph 7 and the expected contributions towards PROW enhancements, including the proposed Bedgebury to Sissinghurst cycle route (g), are supported.
202	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land adjoining Wilsley Farm, adjacent to Angley Road and Whitewell Lane	Policy AL/CRS 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 1 – “Minimal vehicular access points into the site <u>in the interests of highways safety and</u> to reduce any impact upon the Conservation Area...” The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site has some potential for prehistoric and later remains, especially post medieval remains associated with the neighbouring post medieval farms and parklands. Archaeological programme of works may be required.
204	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Big Side Playing Field, adjacent to Quaker Lane and Waterloo Road	Policy AL/CRS 2	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 9 - "The provision of a pedestrian footway from Waterloo Road to Angley Road such that pedestrians can avoid the unsafe route along Quaker Lane, <u>and from the southwest of the site linking to the town centre...</u> " The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site has potential for prehistoric and later remains especially associated with the discovery of some Neolithic flints on the site itself. There is some potential for post medieval burials as there is a known Quaker burial site on the site of Quaker House. It may be that some of these burials have extended southwards in to the allocation site. An Archaeological DBA would be appropriate to inform details of this scheme.
206	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Jaegers Field, Angley Road	Policy AL/CRS 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is some potential for prehistoric and later remains.
208	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Turnden Farm, Hartley Road	Policy AL/CRS 4	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph: <u>The speed limit reduction scheme proposed as part of the planning application 18/02571 should be carried forward as part of this allocation.</u> Additional paragraph: <u>The impact on the Hawkhurst junction will require assessment.</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific references to PRoW in paragraphs 6 and 7 are supported. In addition to these requirements, it is requested that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				There is some potential for prehistoric and later remains.
210	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land adjoining Cranbrook Primary School, Quaker Lane	Policy AL/CRS 5	Highways and Transportation	The Local Highway Authority objects to this policy. The existing vehicular and pedestrian access to site are inadequate. Vehicular access to Angley Road has been considered at pre-stage and not supported by Local Highway Authority as only a very narrow frontage. Quaker Lane also unsuitable.
			Public Rights of Way and Access Service	Improvements should be made to the PRow that pass through the site. It is also requested that PRow enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is some potential for prehistoric and later remains
212	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Gate Farm, adjacent to Hartley Road and Glassenbury Road, Hartley (plus Bull Farm)	Policy AL/CRS 6	Highways and Transportation	The Local Highway Authority objects to this policy. This should be split into two sites to the east and west of the A229. With regard to eastern site - an appeal dismissed regarding access to Hartley Road for NE portion, and KCC as Local Highway Authority raised objection to proposed access to south west section also from Hartley Road. Relocation of speed limit has not been supported by Kent Police. Local Highway Authority has had no involvement in western site to date.
			Public Rights of Way and access Service	Public Bridleway WC127 is located along the southern boundary of this proposed development site, providing access to a wider network of Public Bridleways to the west. These paths offer excellent opportunities for recreational cycling and equestrian activity. Considering the proximity of the site to this access resource, it should be expected that the development will contribute towards off-site PRow enhancements, in preparation for their expected increase in use.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is potential for prehistoric and later remains, especially associated with medieval and post medieval activity. The site seems to include the site of a 16th century beacon, which it would be preferable to retain.
214	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land off Golford Road	Policy AL/CRS 7	Highways and Transportation	The Local Highway Authority objects to this policy. This is unsuitable for sustainable development as part of a plan led approach, owing to there being no key facilities or bus route within safe walking distance, as only a narrow, substandard footway into Cranbrook. This will result in car borne trips. Given the scale of the proposed development, this development will not be acceptable unless a minimum 1.8m wide footway can be achieved between the site and the existing footway network west of Tilsden Lane. This facility would be preferable on the northern side of Golford Road. It is unlikely that this facility can be achieved within site ownership/highway land.
			Public Rights of Way and access Service	It should be expected that improvements will be made to the PRow that pass through the site and contributions will be made for off-site PRow network improvements that surround the site. Attention is also drawn to the High Weald Landscape Trail (HWLT) promoted route, which passes along Golford Road. It is requested that the HWLT is realigned within the site, along a new traffic-free walking route to be provided by the developer, to avoid walking along Golford Road.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is some potential for prehistoric and later remains
216	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst	Policy AL/CRS 8	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>Proposals to include a servicing strategy across the site.</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Former Cranbrook Engineering Site and Wilkes Field			The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and access Service	It should also be expected that improvements will be made to the PRoW that pass through the site. It is also requested that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. This site has considerable potential for medieval and post medieval remains associated with the development of Cranbrook as a medieval market town and centre for the cloth industry. The site has been subject to some archaeological assessment and this must be referenced to inform any detailed design
218	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land adjacent to the Crane Valley	Policy AL/CRS 9	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: The County Council requests that there is mention the consent for Brick Kiln Farm (180 dwellings) in this policy. The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and access Service	It should be expected that improvements will be made to the PRoW that pass through the site. It is also requested that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site includes a post medieval brickwork. Some areas have been quarried out but there is very high potential for large industrial kilns and brick drying and making structures to survive. In addition, this is a largescale site directly adjacent to the historic town of Cranbrook. The impact on the significance of Cranbrook as a medieval market town needs to be thoroughly assessed. Archaeological DBA and Archaeological Landscape are essential to inform this development scheme.
220	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Cranbrook School	Policy AL/CRS 10	Highways and Transportation	The Local Highway Authority supports this policy.
			Heritage Conservation	Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. There is potential for prehistoric and later archaeology, particularly associated with the post medieval development of Cranbrook. There are farms and small holdings identifiable on the 1st Ed OS map which are of local heritage importance although some are designated. The size and scale of this proposal should lead to consideration of the wider impact of the scheme on the significance of Cranbrook itself and its surrounds. A Full Heritage Assessment should be undertaken to inform this allocation.
222	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Sissinghurst Castle Garden	Policy AL/CRS 11	Highways and Transportation	The Local Highway Authority supports this policy.
			Public Rights of Way and access Service	KCC welcomes the specific reference to local footpath improvements in paragraph 3, but the text should be strengthened to include the term 'Public Rights of Way' as there are also Public Bridleways passing through the site.
			Heritage Conservation	Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				This is a highly sensitive site including designated heritage assets. Any proposals should be informed by an Archaeological DBA
224	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land on the east side of Mill Lane	Policy AL/CRS 12	Highways and Transportation	The Local Highway Authority objects to this policy. The Local Highway Authority considers this site unsuitable for residential development. The location of the site significantly limits use of sustainable modes and as a result residents will be largely car dependent; the environment on Mill Lane and the A268 and the lack of footway links to local facilities raise the issue of highway safety; there is currently an unofficial link to the rear of the school via Mill Lane but this is not a PRow and its future is not secure; the Mill Lane/A262 junction is extremely hazardous with no footway provision and very poor visibility.
			Public Rights of Way and access Service	KCC supports the proposal to provide new link with Public Footpath WC75. It should also be expected that contributions will be made towards off-site improvements along Footpath WC75, to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site lies between some post medieval heritage sites including Crampton Mill and Farm complex. Archaeological DBA would be advisable to inform detailed application
226	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road	Policy AL/CRS 13	Highways and Transportation	The Local Highway Authority objects to this policy. KCC considers this site unsuitable for residential development. The location of the site significantly limits use of sustainable modes and as a result residents will be largely car dependent; the environment on Mill Lane and the A268 and the lack of footway links to local facilities raise the issue of highway safety; there is currently an unofficial link to the rear of the school via Mill Lane but this is not a PRow and its future is not secure; the Mill Lane/A262 junction is extremely hazardous with no footway provision and very poor visibility; the visibility splays required for the measured speed of traffic on the A262 where the site access road would be located cannot be accommodated within the site boundary/highway ownership.
			Public Rights of Way and access Service	KCC supports the proposal to create link with Public Footpath WC75. It should also be expected that contributions will be made towards off-site improvements along Footpath WC75, to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is potential for prehistoric and later remains, especially associated with the development of the historic settlement of Sissinghurst.
228	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land south of The Street	Policy AL/CRS 14	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: <u>Additional paragraph - Provision of adequate visibility splays within site and/or highway land (again see criterion 5 of Policy EN 1: Design and other development management criteria)</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and access Service	Provision of a pedestrian link to Public Right of Way WC104, is supported. It should also be expected that contributions will be made towards off-site improvements along Footpath WC104, to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is potential for prehistoric and later remains, especially associated with the development of the historic settlement of Sissinghurst.
230	Section 5: Place Shaping Policies Allocation policies for	Policy AL/CRS 15	Highways and Transportation	The Local Highway Authority objects to this policy. The Local Highway Authority considers this site unsuitable for residential development: <ul style="list-style-type: none"> The location of the site significantly limits use of sustainable modes and as a result residents will be largely car dependent.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Cranbrook and Sissinghurst Oak Tree Farm, The Common, Wilsley Pound			<ul style="list-style-type: none"> The environment on the A229 and the lack of footway links to local facilities raise the issue of highway safety. Access would be taken from a strategic route currently within a 50mph limit (although the 40mph limit has recently been extended north) and it is unlikely that KCC would accept a 30mph limit with the scale of development proposed. Therefore an access here would not be in keeping with MFS design ethos. Pedestrian linkages are poor (there are level differences to the south of the site which may make extension to the footway on the west side of A229 difficult to deliver and to the east of A229 the existing footway is narrow, with spot checks measuring under 1.0m and this would also require improvement). The rural character and lack of footways along Mill Lane and Frittenden Road further limit opportunities to walk into the village and school; there is currently an unofficial link to the rear of the school via Mill Lane but this is not a PRoW and its future is not secure. The Mill Lane/A262 junction is extremely hazardous with no footway provision and very poor visibility. Bus services do not currently pass the site and it is unlikely that any diversion away from the village centre will be feasible.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
232	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land at Boycourt Orchards, Angley Road, Wilsley Pound	Policy AL/CRS 16	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>The Local Highway Authority considers this site unsuitable for residential development:</p> <ul style="list-style-type: none"> The location of the site significantly limits use of sustainable modes and as a result, residents will be largely car dependent. The environment on the A229 and the lack of footway links to local facilities raises the issue of highway safety; access would be taken from a strategic route currently within a 50mph limit (although the 40mph limit has recently been extended north) and it is unlikely that KCC would accept a 30mph limit with the scale of development proposed. Therefore an access here would not be in keeping with MFS design ethos. Pedestrian linkages are poor (there are level differences to the south of the site which may make extension to the footway on the west side of A229 difficult to deliver and to the east of A229 the existing footway is narrow, with spot checks measuring under 1.0m and this would also require improvement). The rural character and lack of footways along Mill Lane and Frittenden Road further limit opportunities to walk into the village and school; there is currently an unofficial link to the rear of the school via Mill Lane but this is not a PRoW and its future is not secure. The Mill Lane/A262 junction is extremely hazardous with no footway provision and very poor visibility. Bus services do not currently pass the site and it is unlikely that any diversion away from the village centre will be feasible.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
234	Section 5: Place Shaping Policies Allocation policies for Cranbrook and Sissinghurst Land adjacent to Orchard Cottage, Frittenden Road, and land at junction of Common Road and Frittenden Road	Policy AL/CRS 17	Highways and Transportation	The Local Highway Authority supports this policy.
			Heritage Conservation	<p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p> <p>Site lies close to a Roman road alignment and there is potential for prehistoric and later remains.</p>
239	Section 5: Place Shaping Policies Hawkhurst The Strategy for Hawkhurst Parish	Policy STR/HA 1	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>It is not yet evident that the changes to the main junction proposed through the Golf Club application will be acceptable (i.e. achieve nil detriment or decrease the level of traffic/congestion/journey time through the junction thereby not causing a severe impact) for the number of dwellings proposed on the Golf Club site - not including further allocations affecting the junction. There is a presumption that the road diversion will relieve the junction significantly in order to allow more development in the village. This is not the case at the time of writing. Until the Golf Club application is assessed (currently awaiting more information,) the cumulative impact of all allocations at Hawkhurst would be likely to cause a severe impact on the junction with no mitigation proposed. KCC as Local Highway Authority therefore objects to the allocation of these sites and any subsequent planning applications.</p> <p>It is recommended that the Borough Council undertake:</p> <p>a) an assessment of the cumulative impact of all proposed allocations - excluding the Golf Club - on the junction as it is currently, and</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>b) assessment of the cumulative impact of all proposed applications - including the Golf Club - with the proposed A229 diversion across the Golf Club site in place.</p> <p>This will assist Tunbridge Wells Borough Council and KCC Highways in understanding the impact of development in this area.</p>
			Public Rights of Way and Access Service	The specific reference to PRow in paragraph 10, including contributions towards the proposed Bedgebury to Sissinghurst cycle route, is supported.
243	Section 5: Place Shaping Policies Allocation policies for Hawkhurst Land forming part of the Hawkhurst Golf Course to the north of the High Street	Policy AL/HA 1	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>The current application on this site does not support the claim that the road will relieve congestion at the junction, and the proposed development may make congestion worse. Therefore, this allocation cannot be supported by the County Council.</p>
			Public Rights of Way and Access Service	Paragraphs 1 and 9 are supported. Further, it is requested that opportunities for the provision of a new link with Public Bridleway WC219 are explored and, if feasible, provided. This is because the right of way provides access to a valuable network of walking, cycling and equestrian routes to the west, which would provide significant outdoor recreation opportunities for Hawkhurst residents. It is also requested that PRow enhancements are included in the list of expected contributions, to mitigate the impact of future development.
			Heritage Conservation	<p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p> <p>This is a large proposed development which could have an impact on the rural historic setting of Hawkhurst and the surrounding small holdings and farm holdings, some of which are historic complexes.</p> <p>There is also some potential for prehistoric and later remains.</p> <p>An Archaeological DBA including an Archaeological Landscape Assessment would be advisable to inform this allocation</p>
246	Section 5: Place Shaping Policies Allocation policies for Hawkhurst Land at The White House, Highgate Hill	Policy AL/HA 2	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>The cumulative impact of 681-731 new dwellings as a result of site allocations AL/HA 1 to AL/HA 6 and AL/HA 9 will cause a severe impact on the local road network - specifically at the A268/A229 Hawkhurst crossroads, with or without the addition of a new road and the stopping up of the northern arm of the junction as proposed in AL/HA 1.</p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>Potential for prehistoric or later remains</p>
248	Section 5: Place Shaping Policies Allocation policies for Hawkhurst Land to the east of Hartenoak	Policy AL/HA 3	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>The cumulative impact of 681-731 new dwellings as a result of site allocations AL/HA 1 to AL/HA 6 and AL/HA 9 will cause a severe impact on the local road network - specifically at the A268/A229 Hawkhurst crossroads, with or without the addition of a new road and the stopping up of the northern arm of the junction as proposed in AL/HA 1.</p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>Potential for prehistoric or later remains</p>
250	Section 5: Place Shaping Policies Allocation policies for Hawkhurst Land at Fowlers Park	Policy AL/HA 4	Highways and Transportation	<p>The Local Highway Authority objects to this policy.</p> <p>The cumulative impact of 681-731 new dwellings as a result of site allocations AL/HA 1 to AL/HA 6 and AL/HA 9 will cause a severe impact on the local road network - specifically at the A268/A229 Hawkhurst crossroads, with or without the addition of a new road and the stopping up of the northern arm of the junction as proposed in AL/HA 1.</p>
			Public Rights of Way and	Paragraph 3 and 10 are seeking the provision of pedestrian links between the site and PRow WC187, are supported. Contributions should also be made towards off-site improvements along Footpath WC187 to mitigate the impact of future development.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Access Service	
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There are multi period metal artefacts known from the fields to the north and there may be associated archaeology in the allocation site. There is potential for prehistoric or later remains. In view of the size of this development there may be an impact on the historic character of Hawkhurst as a medieval market town. Consideration of historic landscape issues would be essential In view of the size of this proposed allocation KCC recommends the need for an Archaeological DBA to inform the allocation.
252	Section 5: Place Shaping Policies Allocation policies for Hawkhurst Brook House, Cranbrook Road	Policy AL/HA 5	Highways and Transportation	The Local Highway Authority objects to this policy. The cumulative impact of 681-731 new dwellings as a result of site allocations AL/HA 1 to AL/HA 6 and AL/HA 9 will cause a severe impact on the local road network - specifically at the A268/A229 Hawkhurst crossroads, with or without the addition of a new road and the stopping up of the northern arm of the junction as proposed in AL/HA 1.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval Some potential for prehistoric or later remains.
254	Section 5: Place Shaping Policies Allocation policies for Hawkhurst Land off Copthall Avenue and Highgate Hill	Policy AL/HA 6	Highways and Transportation	The Local Highway Authority objects to this policy. The cumulative impact of 681-731 new dwellings as a result of site allocations AL/HA 1 to AL/HA 6 and AL/HA 9 will cause a severe impact on the local road network - specifically at the A268/A229 Hawkhurst crossroads, with or without the addition of a new road and the stopping up of the northern arm of the junction as proposed in AL/HA 1.
			Public Rights of Way and Access Service	Contributions should also be made towards off-site improvements along Footpath WC189 to mitigate the impact of future development.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval Site contains some post medieval brickworks and substantial industrial structures may survive on site. Archaeological DBA would be appropriate
256	Section 5: Place Shaping Policies Allocation policies for Hawkhurst Sports Pavilion, King George V Playing Fields, The Moor	Policy AL/HA 7	Highways and Transportation	The Local Highway Authority conditionally supports this policy. This site raises less concern than the residential sites in the village, owing to the spread of trips throughout the day (without a concentration during the AM and PM peaks) but any development proposal needs to be supported by a Transport Assessment including an impact assessment on the Hawkhurst junction. The following change is requested: <i>Additional paragraph - <u>Proposals for the development of this site shall be supported by a Transport Assessment including an impact assessment on the Hawkhurst junction.</u></i>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval Some potential for prehistoric and later remains.
258	Section 5: Place Shaping Policies	Policy AL/HA 8	Highways and Transportation	The Local Highway Authority conditionally supports this policy.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Allocation Policies for Gill's Green Hawkhurst Station Business Park			<p>This site raises less concern than the residential sites in the village, owing to the spread of trips throughout the day (without a concentration during the AM and PM peaks) but any development proposal needs to be supported by a Transport Assessment including an impact assessment on the Hawkhurst junction.</p> <p>The following changes are requested:</p> <p><u>Additional paragraph - <i>Proposals for the development of this site shall be supported by a Transport Assessment including an impact assessment on the Hawkhurst junction.</i></u></p> <p>The standard paragraph regarding contributions should feature in this policy - <u><i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i></u></p>
			Heritage Conservation	<p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p> <p>Some potential for prehistoric and later remains</p>
260	Section 5: Place Shaping Policies Allocation Policies for Gill's Green Land at Santers Yard, Gill's Green Farm	Policy AL/HA 9	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The cumulative impact of 681-731 new dwellings as a result of site allocations AL/HA 1 to AL/HA 6 and AL/HA 9 will cause a severe impact on the local road network - specifically at the A268/A229 Hawkhurst crossroads, with or without the addition of a new road and the stopping up of the northern arm of the junction as proposed in AL/HA 1.</p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>Some potential for prehistoric or later remains</p>
262	Section 5: Place Shaping Policies Allocation Policies for Gill's Green Site at Limes Grove	Policy AL/HA 10	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>This site raises less concern than the residential sites in the village, owing to the spread of trips throughout the day (without a concentration during the AM and PM peaks) but any development proposal needs to be supported by a Transport Assessment including an impact assessment on the Hawkhurst junction.</p> <p>The following changes are requested:</p> <p><u>Additional paragraph - <i>Proposals for the development of this site shall be supported by a Transport Assessment including an impact assessment on the Hawkhurst junction.</i></u></p> <p>The standard paragraph regarding contributions should feature in this policy - <u><i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i></u></p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>Some potential for prehistoric or later remains</p>
265	Section 5: Place Shaping Policies Benenden The Strategy for Benenden Parish	Policy STR/BE 1	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested</p> <p>Paragraph 5 – “Maintenance and enhancement of, and/or linkages to, <u><i>public footway network</i></u>, public rights of way and the local strategic cycle network...”</p> <p>The standard paragraph regarding contributions should feature in this policy - <u><i>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</i></u></p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Public Rights of Way and Access Service	The specific reference to PRow in paragraph 5 is supported. It is requested that PRow enhancements are also included in the list of expected contributions, to mitigate the impact of future development.
268	Section 5: Place Shaping Policies Allocation Policies for Benenden Land at Walkhurst Road	Policy AL/BE 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested Paragraph 2 - "Provision of an internal footway and extension of footway in Walkhurst Road <u>to link to existing footway</u> to the south" The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Some potential for prehistoric or later remains
270	Section 5: Place Shaping Policies Allocation Policies for Benenden Land adjacent to New Pond Road (known as Uphill)	Policy AL/BE 2	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested Paragraph 2 - "The provision of a pedestrian footway from the site entrance, past Hortons Close, to the junction of New Pond Road and the B2086 (on <u>highways</u> land). This shall..." The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u> With regards to point b in this policy, KCC is unaware of any works proposed for this junction. Therefore the removal and change to <u>Any other highway works</u> is requested.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Some potential for prehistoric or later remains
272	Section 5: Place Shaping Policies Allocation Policies for Benenden Feoffee Cottages and land, Walkhurst Road	Policy AL/BE 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Some potential for prehistoric or later remains
274	Section 5: Place Shaping Policies Allocation Policies for Benenden Land at Benenden Hospital	Policy AL/BE 4	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Conservation	Some potential for prehistoric or later remains. The 1st Ed OS map records a smithy on the site and remains associated with post medieval activity may survive on site.
277	Section 5: Place Shaping Policies Bidborough The Strategy for Bidborough Parish	Policy STR/BI 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 4 – “Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility” The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific reference to PRow in paragraph 4 and the expectation that contributions will be made towards PRow to mitigate the impact of development (f) is supported.
281	Section 5: Place Shaping Policies Brenchley and Matfield Parish The Strategy for Brenchley and Matfield Parish	Policy STR/BM 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: Paragraph 6 - “Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility”
			Public Rights of Way and Access Service	The specific reference to PRow in paragraph 6 is supported. It is requested that PRow enhancements are included in the list of expected contributions, to mitigate the impact of future development.
284	Section 5: Place Shaping Policies Allocation policies for Brenchley and Matfield Parish Land between Brenchley Road, Coppers Lane, and Maidstone Road	Policy AL/BM 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: <u>Paragraph 2 - Improved pedestrian access to include works at junction of Maidstone Rd/Brenchley Rd and Chestnut Lane and along Maidstone Rd and also to include crossing points</u> Points 5, 6 and 7 should be removed. The Transport Assessment will highlight specific mitigation measures: should not be pre-empted at this stage. The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
286	Section 5: Place Shaping Policies Allocation policies for Brenchley and Matfield Parish Matfield House orchards and land, The Green	Policy AL/BM 2	Highways and Transportation	The Local Highway Authority objects to this policy. This is a landlocked site. The site does not abut Chestnut Lane and the narrow farm access is outside the red line boundary.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
288	Section 5: Place Shaping Policies	Policy AL/BM 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Allocation policies for Brenchley and Matfield Parish Ashes Plantation, Maidstone Road			<p>The following changes are requested:</p> <p>Paragraph 1 – “Vehicular access into the site to be informed by <u>a Transport Assessment, to include assessment of junction of Maidstone Road/Oakfield Road</u>”</p> <p>Paragraph 3 – “Provision of pedestrian access to Maidstone Road <u>including assessment and provision of pedestrian crossing points</u>”</p> <p>Paragraph 5 – “<u>Contributions (50%) towards the</u> provision of a pedestrian access to the existing children's play space at Maidstone Road”</p> <p>Points 6 and 7 should be removed. The Transport Assessment will highlight specific mitigation measures: should not be pre-empted at this stage.</p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p> <p>In Point a – reference to traffic calming should be removed.</p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>Potential for remains associated with post medieval activity</p>
290	Section 5: Place Shaping Policies Allocation policies for Brenchley and Matfield Parish Land at Maidstone Road	Policy AL/BM 4	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 1 – “Vehicular access into the site <u>to be informed by Transport Assessment, to include assessment of junction of Maidstone Road/Oakfield Road, including assessment/construction of pedestrian crossing points</u>”</p> <p>Points 3, 4 and 5 should be removed. The Transport Assessment will highlight specific mitigation measures: should not be pre-empted at this stage.</p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p> <p>In Point a – reference to traffic calming should be removed</p>
			Heritage Conservation	<p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>Potential for remains associated with post medieval activity</p>
292	Section 5: Place Shaping Policies Frittenden The Strategy for Frittenden Parish	Policy STR/FR 1	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 4 – “Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility”</p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Public Rights of Way and Access Service	<p>The specific reference to PRoW in paragraph 4 is supported. It is requested that PRoW enhancements are also included in the list of expected contributions, to mitigate the impact of future development.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
295	Section 5: Place Shaping Policies Allocation policies for Frittenden Parish Land at Cranbrook Road	Policy AL/FR 1	Highways and Transportation	The Local Highway Authority objects to this policy. KCC considers this site unsuitable for residential development: The policy makes no mention of footway links to the existing network. A link would be vital to access local facilities and it is doubtful that the site can deliver this. The location of the site significantly limits use of sustainable modes and as a result residents will be largely car dependent without a footway connection. The lack of footway links to local facilities raises the issue of highway safety.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
299	Section 5: Place Shaping Policies Goudhurst The Strategy for Goudhurst Parish	Policy STR/GO 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 6 - "Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility" The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific reference to PRoW in paragraph 6 is supported. It is requested that PRoW enhancements are also included in the list of expected contributions, to mitigate the impact of future development.
302	Section 5: Place Shaping Policies Allocation policies for Goudhurst Parish Land east of Balcombes Hill and adjacent to Tiddymotts Lane	Policy AL/GO 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 1 – " <u>Use of existing access point from the minor access road off Balcombes Hill. The scheme also to provide improved visibility splays at the junction with Balcombes Hill...</u> " Paragraph 3 – "Location and design of pedestrian access to reflect the significant level changes into the site, <u>and improvements to footway links into the village to be provided including improved crossing point on Balcombes Hill.</u> " The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site has potential for prehistoric remains as a hoard of Bronze Age palstaves was located on or near to the site. The 1st Ed OS map indicates a small holding and quarry on the site and there may be remains of Medieval or post medieval activity. Archaeological DBA would be appropriate
304	Section 5: Place Shaping Policies Allocation policies for Goudhurst Parish	Policy AL/GO 2	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Land at Triggs Farm, Cranbrook Road		Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low potential for archaeological remains.
307	Section 5: Place Shaping Policies Horsmonden The Strategy for Horsmonden Parish	Policy STR/HO 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: The policy should include consideration of the provision of pedestrian links from the site. Paragraph 5 – “Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility” The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific reference to PRoW in paragraph 5 is supported. While contributions towards feasibility studies for enhancing PRoW are welcomed, it is requested that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
309	Section 5: Place Shaping Policies Allocation policies for Horsmonden Parish Land adjacent to Furnace Lane and Gibbet Lane	Policy AL/HO 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested: The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low potential for archaeological remains.
311	Section 5: Place Shaping Policies Allocation policies for Horsmonden Parish Land south of Brenchley Road and west of Fromandez Drive	Policy AL/HO 2	Highways and Transportation	The Local Highway Authority objects to this policy. KCC as Local Highway Authority is unable to support without a footway link into the settlement. It appears the site is unable to deliver a pedestrian link to any existing facilities which are some distance from the site. Currently appears any link to Fromandez Drive is outside of site boundary. Paragraph 9 - suggests opportunities for parking - this would require good pedestrian links to key facilities Paragraph 10 - suggests a replacement village hall may be sited on this site - this must be safely accessible by foot from the residential areas of the village.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site lies adjacent to historic gardens of Sprivers and also contains a spring and small water channel. There is potential for prehistoric or later activity.
313	Section 5: Place Shaping Policies Allocation policies for Horsmonden Parish	Policy AL/HO 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. KCC would prefer to see these sites split owing to the fact they are not joined and will have different access requirements. The following changes are requested:

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Land to the east of Horsmonden			<p>Paragraph 1 – <u>“The vehicular access points into the two parcels of lane will be required to accommodate any existing uses which continue to take access through the sites. A Highways Assessment will inform the location of the access points”</u></p> <p>Paragraph 3 – “Provision of pedestrian links <u>between the sites and</u> Bassetts Farm..”</p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Public Rights of Way and Access Service	<p>Paragraph 4 requirement for development to preserve the amenity of PRoW WT340A and WT341 is supported. It is also requested that improvements are also made to these PRoW, where there pass through the development site.</p> <p>Paragraph 5 should be amended and strengthened. The section of Hop Pickers Line that passes through the development site should be dedicated as a Public Bridleway by the developer and surfaced to an appropriate specification, to be agreed by the KCC PRoW and Access Service. This would provide a sustainable transport link through the village of Horsmonden and contribute towards the long term aspiration to create a sustainable cycle route along the Hop Pickers line.</p> <p>Off-site PRoW enhancements should also be included in the list of expected contributions, to mitigate the impact of future development.</p>
			Heritage Conservation	<p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p> <p>The site has some potential for prehistoric and later remains. It also contains part of the Hawkurst to Paddock Wood Hop Line, a railway specifically built to serve 19th and 20th century hop pickers. The site may also contain remnants of Horsmonden Station.</p> <p>The railway line and station are important local heritage assets and they must be preserved in situ.</p> <p>This allocation needs to be supported by a full Archaeological DBA and assessment of the railway heritage.</p>
316	Section 5: Place Shaping Policies Lamberhurst The Strategy for Lamberhurst Parish	Policy STR/LA 1	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 5 - “Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility”</p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Public Rights of Way and Access Service	<p>The specific reference to PRoW in paragraph 5 is supported. It is requested that PRoW enhancements are also included in the list of expected contributions, to mitigate the impact of future development.</p>
318	Section 5: Place Shaping Policies Allocation policies for Lamberhurst Parish Land to the west of Spray Hill	Policy AL/LA 1	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 1 - “The provision of pedestrian links <u>from the proposed residential area in the south through the site to the north leading to the village, and from the site westwards</u> along Sand Road to link into the wider footway network”</p> <p>Paragraph 4 - “Residential development to be located on the southern part of the site only, with <u>location of access to be informed by a Transport Assessment</u>”</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The provision of pedestrian and cycle linkages to PRow WT387 and WT388 are supported, but consideration will need to be given to upgrading these Public Footpaths for cycling access, to enable onward connectivity. It is requested that enhancements will be made to the PRow, where they pass through the site. Contributions will also need to be made towards off-site PRow improvements to improve their accessibility, facilitate cycle access and improve active travel links with the Scotney Castle Estate.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval The site has potential for post medieval remains associated with the settlement of Lamberhurst. There are several designated historic buildings adjacent or close to the site. Development should be supported by an Archaeological DBA
320	Section 5: Place Shaping Policies Allocation policies for Lamberhurst Parish Misty Meadow, Furnace Lane	Policy AL/LA 2	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Additional paragraph - <u>Link to existing footway network on Furnace Lane must be achieved.</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The policy requirement to protect and enhance the amenity of PRow WT383 (paragraph 4) is supported. The expectation that contributions will be required towards improved access and footpaths is also welcomed.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
324	Section 5: Place Shaping Policies Pembury The Strategy for Pembury Parish	Policy STR/PE 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 5 - "Maintenance and enhancement of, and/or linkages to, <u>public footway network and</u> public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility. To include development of <u>a segregated</u> cycle route..." Paragraph 7- "Measures to be taken to reduce the impact of proposed development on <u>the local and strategic road networks at key links and junctions.</u> " Additional paragraph (i) - <u>Public transport service and infrastructure improvements.</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific reference to PRow and Tunbridge Wells Circular route (paragraph 5) is supported. It is requested that PRow enhancements are also included in the list of expected contributions, to mitigate the impact of future development.
327	Section 5: Place Shaping Policies	Policy AL/PE 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested:

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Allocation policies for Pembury Parish Land rear of High Street and west of Chalket Lane			<p>Paragraph 1 - <u>Vehicular access onto High Street from western point to be informed by a Transport Assessment. Village Hall access to be emergency/pedestrian/cyclist route only.</u></p> <p>Paragraph 2 – “Provision of links to the <u>wider public footway network</u>, public right of way network, and cycle network...”</p> <p>Paragraph 4 - “Opportunities for the provision of a <u>segregated cycle route linking to the A264 Pembury Road cycle route into the town centre to be explored and where feasible, provided</u>”</p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Public Rights of Way and Access Service	The provision of new links between the site and the wider PRoW network is supported. It should also be expected that contributions will be made towards off-site improvements along PRoW.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
329	Section 5: Place Shaping Policies Allocation policies for Pembury Parish Land at Hubbles Farm and south of Hastings Road	Policy AL/PE 2	Highways and Transportation	<p>The Local Highway Authority conditionally supports this policy.</p> <p>The following changes are requested:</p> <p>Paragraph 1 - “Vehicular access onto <u>Hastings Road to be informed by a Transport Assessment. A suitable stagger will be required between the new access road and Belfield Road</u>”.</p> <p>Paragraph 3 – “Provision of pedestrian and cycle link to west to join existing Public Right of Way WT240 <u>and the wider footway/cycleway network</u>”</p> <p>Paragraph 4 - “Provision of pedestrian and cycle link to south to join Public Right of Way WT239 and east to join WT237 <u>and the wider footway/cycleway network</u>”</p> <p>Paragraph 5 – “Opportunities for the provision of a <u>segregated</u> cycle route linking to the <u>A264 Pembury Road cycle route into the town centre to be explored and where feasible, provided.</u>”</p> <p>Additional paragraph - <u>Provision of adequate visibility splays within site and/or highway land (again see criterion 5 of Policy EN 1: Design and other development management criteria)</u></p> <p>Paragraph 2 should be removed. The Transport Assessment will highlight specific mitigation measures: should not be pre-empted at this stage.</p> <p>The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u></p>
			Public Rights of Way and Access Service	<p>The requirement to provide pedestrian/cycle links with the surrounding PRoW network is supported. However, the surrounding Public Footpaths will need to be upgraded to facilitate cycling and enable onward connectivity. It is therefore requested that contributions will be made towards off-site improvements along PRoW.</p> <p>Opportunities for upgrading the PRoW network surrounding the development site, including the establishment a Bridleway link with PRoW WB43, should be explored and, if feasible, provided. This is because Public Bridleway WB43 provides a valuable walking, cycling and equestrian link with Hawkenbury/South East Tunbridge Wells. Establishing higher access rights would unlock opportunities for active travel and outdoor recreation.</p>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				Low archaeological potential
331	Section 5: Place Shaping Policies Allocation policies for Pembury Parish Land north of the A21, south and west of Hastings Road	Policy AL/PE 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 3 - "Provision of links to the <u>public footway network (to include crossing points on Hastings Road) and public rights of way and the local strategic cycle network</u> in accordance with Policy TP 2: Transport Design and Accessibility" The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The requirement to provide pedestrian/cycle links with the surrounding PRow network (paragraph 2) is supported. However, the surrounding Public Footpaths will need to be upgraded to facilitate cycling and enable onward connectivity. It is therefore requested that contributions will be made towards off-site improvements along PRow. Opportunities for upgrading the PRow network surrounding the development site and establishing a Bridleway link with PRow WB43 should be explored and, if feasible, provided. This is because Public Bridleway WB43 provides a valuable walking, cycling and equestrian connection with Hawkenbury/South East Tunbridge Wells. Establishing higher access rights would unlock new opportunities for active travel and outdoor recreation.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
333	Section 5: Place Shaping Policies Allocation policies for Pembury Parish Land at Downingbury Farm, Maidstone Road	Policy AL/PE 4	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 4 – "Provision of links to <u>the public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility" The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific references to PRow in paragraphs 2 and 3 are supported.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
335	Section 5: Place Shaping Policies Allocation policies for Pembury Parish Land at Sturgeons fronting Henwood Green Road	Policy AL/PE 5	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 4 – "Provision of links to <u>the public footway network</u> and public rights of way and the local strategic cycle network in accordance with Policy TP 2: Transport Design and Accessibility" Additional paragraph - <u>Small business units to be located on the north western part of site (subject to evidence of demand) with adequate on site parking and servicing facilities</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<i>developer. A contribution may be taken if appropriate</i>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
337	Section 5: Place Shaping Policies Allocation policies for Pembury Parish Land at Tunbridge Wells Hospital, Pembury and adjacent to Tonbridge Road	Policy AL/PE 6	Highways and Transportation	The Local Highway Authority conditionally supports this policy. This policy should be split into 3: Hospital land, Notcutts and Owl's Nest. Preferable in highway terms to understand proposed land use of each site and respond accordingly. The following changes are requested: Paragraph 5.133: "Tonbridge Road crosses through the site, <u>linking this allocation to the A21</u> , a major Public Highway controlled by Highways England" Paragraph 2 – <u>Provision of a new/improved segregated cycle route to Royal Tunbridge Wells</u> Additional paragraph - <u>Maintenance and enhancement of, and/or linkages to, public footway network, public rights of way</u> Additional paragraph - <u>Proposals must be informed by a Transport Assessment and Travel Plan...</u> Additional paragraph - <u>Access arrangements to Owl's Nest to be incorporated into the existing signalised junction serving the hospital</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific reference to PRow in paragraph 1 is supported.
			Heritage Conservation	Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. There is potential for prehistoric remains and there may remnants of the earlier hospital structures. If remains survive they would be of local heritage interest and need to be appropriately considered. An Archaeological DBA would be helpful with clarification of the extent of previous ground disturbance.
339	Section 5: Place Shaping Policies Allocation policies for Pembury Parish Woodsgate Corner	Policy AL/PE 7	Highways and Transportation	The Local Highway Authority objects to this policy. This site is in the current Site Allocations as a Park & Ride. The proposed removal of this Park & Ride allocation from the new Local Plan effectively removes the chance of an improved direct public transport service into the town. With the levels of proposed growth to the north of this site further along the A228 corridor, the safeguarding of this well located site for Park & Ride (or innovative alternative) is vital. The inability to deliver a Park & Ride site could put uncertainty on the Borough Council's ability to deliver the preferred growth strategy. In addition, the current live application for this site does not show how new trips on this part of the network can be mitigated.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low potential for archaeological remains
341	Section 5: Place Shaping Policies Rusthall The Strategy for Rusthall	Policy STR/RU 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 5 – "Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> , public rights of way..."

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Parish			The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific reference to PRoW in paragraph 5 is supported. It is requested that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
344	Section 5: Place Shaping Policies Allocation policies for Rusthall Parish Lifestyle Motor Europe, Langton Road	Policy RU 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 1 - <u>Suitable location of vehicular access to be established through a Transport Assessment.</u> Additional paragraph - <u>Provision of adequate visibility splays within site and/or highway land (again see criterion 5 of Policy EN 1: Design and other development management criteria)</u> The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval There is potential for prehistoric remains and for structural remains associated with the post medieval activity on the site. An Archaeological DBA would be useful to support application
346	Section 5: Place Shaping Policies Sandhurst The Strategy for Sandhurst Parish	Policy STR/SA 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 4 - "Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> , public rights of way..." The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u> The specific speed limit changes and call for traffic calming requested in point e) are not acceptable to the Local Highway Authority and should be removed. The Transport Assessment will highlight specific mitigation measures: should not be pre-empted at this stage.
			Public Rights of Way and Access Service	The specific reference to PRoW in paragraph 4 is supported. It is requested that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
349	Section 5: Place Shaping Policies Allocation policies for Sandhurst Parish Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane	Policy AL/SA 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 1 – "Provision of vehicular access informed by Highways Assessment (<u>to include assessment of junction with A268</u>) and landscape and visual impact assessment" Paragraph 2 – " <u>Investigation and</u> provision of <u>pedestrian</u> crossing facilities on Rye Road" Paragraph 3 – " <u>Scheme to demonstrate (or provide for) pedestrian connectivity between the site and Sandhurst Primary School</u> " The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Public Rights of Way and Access Service	The provision of pedestrian links between the site and Public Footpath WC295 are supported. It is requested that contributions will also be made towards off-site improvements along this PRoW, to mitigate the impact of the development.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
351	Section 5: Place Shaping Policies Allocation policies for Sandhurst Parish Land adjacent to Old Orchard and Stream Pit Lane	Policy AL/SA 2	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u> It should also be noted that Old Orchard appears to be a private drive.
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
355	Section 5: Place Shaping Policies Speldhurst The Strategy for Speldhurst Parish	Policy STR/SP 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 4 – “Maintenance and enhancement of, and/or linkages to, <u>public footway network</u> , public rights of way...” The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Public Rights of Way and Access Service	The specific reference to PRoW in paragraph 5 is supported. It is requested that PRoW enhancements are included in the list of expected contributions, to mitigate the impact of future development.
358	Section 5: Place Shaping Policies Allocation policies for Speldhurst Parish Land to the west of Speldhurst Road and south of Ferbies	Policy AL/SP 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following change is requested The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
360	Section 5: Place Shaping Policies Allocation policies for Speldhurst Parish Land north of Langton House	Policy AL/SP 2	Highways and Transportation	The Local Highway Authority supports this policy.
			Heritage Conservation	Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval Some Mesolithic flints are recorded from this site and there may be further associated remains.

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
362	Section 5: Place Shaping Policies Allocation policies for Speldhurst Parish Land adjacent to Rusthall recreation ground, Southwood Road	Policy AL/SP 3	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested: Paragraph 2 - “The provision of details for any additional on-site car parking, <u>to include area for overspill parking</u> ” The standard paragraph regarding contributions should feature in this policy - <u>It is expected that mitigation measures will be implemented by the developer. A contribution may be taken if appropriate</u>
			Heritage Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Low archaeological potential
365	Section 6: Development Management Policies Environment Design and other development management criteria	Policy EN 1	Highways and Transportation	The Local Highway Authority conditionally supports this policy. The following changes are requested at Part 5 – Transport: Paragraph 1 – “Vehicular access, parking provision, and pedestrian movement should be safely accommodated. <u>Traffic from new development should not cause material harm to the operation and safety of the local highway network</u> in accordance with Policies TP 2: Transport Design and Accessibility and TP 3: Parking Standards; and” Paragraph 2 – “Any car parking or servicing should be appropriate to the context of the site, and designed and located so as not to cause material harm <u>to the safe operation of the highway</u> or visual amenity and dominate the street scene and public realm; and”
			Public Rights of Way and Access Service	Paragraph 614 -It is requested that the KCC PRow and Access Service Good Design Guide is added to the list of guidance. The purpose of this guide is to aid decision making and promote good design in public path and countryside access management. Applying to both urban and rural locations, the design guide is intended to complement and, where appropriate, draw together relevant technical and design information, both national and local, that has already been published. <u>Policy EN1</u> The specific reference to PRow in Part 7 is supported. The Design Criteria should be strengthened by including a requirement for development applications to show recorded PRow on their plans. Where PRow would be directly affected by development proposals, planning applications should clarify intentions for positively accommodating, diverting or enhancing paths.
			Sustainable Urban Drainage Systems	Water/Flooding Features the recent revisions to the NPPF highlight the need for consideration of multi-functionality within sustainable drainage schemes. The policy should seek to ensure the multi-functionality and/or integration of SuDS within open space.
			Heritage Conservation	Paragraph 6.7 - It is suggested that <u>archaeological sites</u> be added to the list of heritage types in the first sentence. Paragraph 6.12 - It should be noted that the ‘grain’ in the Borough is not only ‘urban grain’ as stated in the current text. The countryside has its own grain consisting of settlements, tracks, lanes and field boundaries that has evolved over many centuries. This grain is identified in the Historic Landscape Characterisation mentioned above (see ‘Policy STR 7 Place shaping and design’). For new development to be successfully integrated into the Borough’s existing settlements and communities it is important that it works with this grain. Policy EN 1 <u>Part 1 Character and site context</u> Paragraph 2 - In accordance with the comments under paragraph 6.12 above, it is suggested that clause 2 be amended to “ <u>The siting, layout, density,</u>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p><i>spacing, orientation, and landscaping must respect the characteristics of the site, including its topography and any natural features, its relationship with immediate surroundings, historic setting, and where appropriate, views into and out of the site;</i>“</p> <p>Paragraph 4 - The historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have already been built with the embodied carbon that implies. It may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced guidance ('Climate Change and the Historic Environment', 2008) that reviews the threats to the historic environment posed by climate change. The guidance also demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient, than more modern structures and settlements.</p> <p><u>Part 2 Water/flooding features</u></p> <p>SuDS may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains in particular are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>When SuDS are planned, it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced guidance for SUDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.</p>
			Sustainable Business and Communities	This policy could be strengthened to highlight the multiple benefits from well designed landscaping and tree planting; with potential benefits for air quality, biodiversity, carbon reduction, flood and heatwave mitigation.
370	Section 6: Development Management Policies Environment Sustainable Design and Construction	Policy EN 2	Sustainable Business and Communities	<p>Paragraph 6.13 – this paragraph could be strengthened to highlight the multiple benefits from well designed landscaping and tree planting; with potential benefits for air quality, biodiversity, carbon reduction, flood and heatwave mitigation.</p> <p>Paragraph 6.18 - this paragraph does not acknowledge that biomass burning can have a detrimental impact on air quality and is consequently not suitable in air quality management areas. This paragraph seems to be in conflict with paragraph 6.243, which acknowledges the impacts.</p> <p>Policy EN2 paragraph 5 – KCC considers that “minimising carbon dioxide emissions” will not be sufficient to achieve KCC’s and the Borough Council’s own zero-carbon commitments, and therefore suggests that this step be re-worded to prioritise development achieving net-zero.</p> <p>Policy EN2 paragraph 6 – This should be reworded to define the climate risks (heat and flood), to ensure the risks from overheating are not overlooked.</p>
			Heritage Conservation	<p>Paragraph 6.21 – Refer to comments under Policy EN 1, Part 1, paragraph 4 with regard to this paragraph.</p> <p>Paragraph 6.38 - Refer to comments under Policy EN 1, Part 1, paragraph 4 with regard to this paragraph.</p>
374	Section 6: Development Management Policies Environment Energy Reduction in New Buildings	Policy EN 4	Sustainable Business and Communities	The County Council is supportive of the policies within the Climate Change Mitigation section. These policies will support the implementation of the Kent Environment Strategy. It should be noted that paragraph 6.31 should be updated to reflect changes to the Climate Change Act, which has been revised to include a carbon reduction target of net-zero by 2050.
376	Section 6: Development	Policy EN 5		

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Management Policies Environment Climate Change Adaptation			
379	Section 6: Development Management Policies Environment Historic Environment	Policy EN 6	Heritage Conservation	<p>Paragraph 6.45 - The historic environment of the Borough is not only 'valuable', it is irreplaceable. Once lost it cannot be recreated which makes it different from many other aspects of the environment. It is therefore suggested that the word <i>irreplaceable</i> be added to the first sentence of this paragraph.</p> <p>As elsewhere in the Draft Local Plan, the text does not mention archaeological sites. These heritage assets are reviewed in the response to Policy STR 8 and it is suggested that a new bullet point be added to the text:</p> <p>Archaeological sites, including such diverse sites as iron age hillforts, medieval moated sites, Tudor furnaces and post-medieval woodland management features.</p> <p>Paragraph 6.48 - The intention to produce a Historic Environment SPD and Framework is welcomed. It is to be hoped that together these will comprise a Heritage Strategy for Tunbridge Wells Borough and indeed it might be preferable to combine them into a single strategy. Irrespective of whether a single strategy is published, or broken down into separate SPDs and other documents, the approach should have a series of goals, some of which have already been met in the Historic Environment Review:</p> <ul style="list-style-type: none"> • To assess the role that heritage can play in in regeneration and tourism • To identify heritage assets' vulnerabilities and the opportunities they provide • To inform site allocations within the district • To support policy development <p>If the Authority decides not to pursue a Heritage Strategy, then it is essential that the Local Plan underpins the conservation and enjoyment of the historic environment in all relevant sections. The sections will need to describe the contribution that the historic environment can make as well as the issues that need to be considered to ensure appropriate conservation of heritage assets.</p> <p>These should include:</p> <ul style="list-style-type: none"> • Building design (eg the need for new build to respect local character in terms of form, size, materials, massing and orientation) • Settlement hierarchy and design (eg the benefits of new development respecting the layout of boundaries, roads and lanes so that they fit into the grain of existing settlement) • Landscape and green infrastructure (eg using aspects of the historic landscape to promote connectivity and ensure that historic character is enhanced) • Natural environment and coasts (eg recognising the wealth of heritage assets along the Medway and that these can take the form of settlement, maritime or military sites) • Tourism and economy (eg identifying those heritage assets that can play a greater economic role in the area by promoting them as tourist sites or re-using historic buildings for new purposes). • Sustainability and climate change (eg bringing together recent research by Historic England on the energy savings often inherent in existing buildings compared with the cost of demolition and new build but also the need for historic buildings to be treated sympathetically when energy improvements are being made) • Flood risk (eg the need for SUDS permissions to take account of the impact they can have on historic structures and archaeological sites. Guidance on this is available from KCC Heritage Conservation) <p><u>Policy EN 6</u></p> <p>KCC is concerned by the text "All new development shall commit to the overall conservation and, where possible, enhancement, of the historic environment of the borough..". This could be interpreted as saying that development will be permitted provided that the heritage of the Borough as a whole is enhanced, even if the heritage of the site is damaged.</p> <p>KCC would suggest this be re-phrased as: <i>"All new development shall contribute to the overall conservation and, where possible, enhancement, of the historic environment of the borough, by demonstrating how their proposals have had regard to the advice set out in current government historic environment policy and guidance"</i>.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>This would make it clear that developers need to follow the requirements of the NPPF for their own individual sites fully, but that the results of this work will be to enhance the historic environment of the Borough.</p> <p>The final paragraph of the policy should be clear, KCC as suggested the following rewrite:</p> <p><u>All proposals shall demonstrate:</u></p> <ol style="list-style-type: none"> <u>An understanding of the heritage assets affected by the proposal including their local and regional context</u> <u>How the heritage assets and their setting will be enhanced by the proposal. If it is not possible to enhance the heritage, then it should be demonstrated what options for doing so have been considered and why they are inappropriate.</u> <u>How the heritage assets and their setting will be impacted by the proposal if it is not possible to enhance them.</u>
384	Section 6: Development Management Policies Environment Heritage Assets	Policy EN 7	Heritage Conservation	<p>Heritage Assets</p> <p>Paragraph 6.57 - It should be noted that for some proposals affecting heritage assets a Heritage Statement will be insufficient. Where proposals affect sites of archaeological interest it is probable that a desk-based assessment and possibly fieldwork will be needed. KCC Heritage Conservation is currently producing advice on writing Heritage Statements and will also be publishing advice that will help applicants identify whether a desk-based assessment and/or fieldwork will be needed.</p> <p>Listed Buildings</p> <p>Many Listed Buildings will have an archaeological relevance – either below ground remains within the structure itself or below the immediate environs, or above ground remains in terms of the structure of the building and what it can tell us about construction techniques etc. In such circumstances a building recording survey will be required to ensure that important information is not lost. It would be helpful if the text could reflect that some form of recording may be required as part of the Council’s response to Listed Building applications.</p> <p>Conservation Areas</p> <p>Paragraph 6.64 - KCC welcomes the commitment to review and complete the Borough’s Conservation Area Appraisals.</p> <p>Scheduled Monuments</p> <p>It would be helpful if the text could mention that the Borough may contain archaeological sites or monuments that are not currently Scheduled but which are of comparable significance and that such sites will be treated as though they were in fact scheduled by both Historic England and by the Borough Council.</p> <p>Archaeological sites</p> <p>Paragraphs 6.70 – 6.74 - The summary of the archaeological heritage of the Borough in this section is succinct but effective. It would be helpful if it could be repeated earlier in the text under ‘Conserving the Built, Natural and Historic Environment’ where information about the archaeological heritage is currently lacking.</p> <p>One addition to the text that KCC would recommend is that it refer to the Borough’s more recent archaeological heritage in the form of industrial, civil and military sites of the 19th – 21st centuries. These include hospitals, non-denominational churches, hop-pickers huts, Second World War pillboxes etc.</p> <p>Paragraph 6.75 - It is not clear what is meant by “Areas of greatest sensitivity to change will be agreed with a view to undertaking a focused desktop review of assets by number and by type, with reference to the Kent Historic Environment Record. This work will form the basis for new Archaeological Notification Areas, which will be in place by March 2020.” The development of the Archaeological Notification Areas will indeed identify areas of greatest sensitivity to change (as KCC understand them at the time the Archaeological Notification Areas (ANA) are issued) but KCC are not intending to carry out a review of assets by number and type and the completion of the ANAs is not conditional on such a Review. The County Council requests clarity from the Borough Council on this matter.</p> <p>Conserving and enhancing the natural, built, and historic environment</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>This section should include details of the Borough's archaeological heritage. KCC would suggest that the succinct summary currently presented much later in the text in sections 6.70 to 6.74 is replicated or made reference to.</p> <p>Policy EN 7</p> <p>The text currently states: "Proposals that affect a designated or non-designated heritage asset, or its setting, will only be permitted where the development conserves or enhances the character, appearance, amenity, and setting of the asset; and in the case of historic parks and gardens, provides, where possible, improvement of access to it."</p> <p>This approach may not be sustainable. The reality is that the Borough Council will regularly grant planning permission to proposals that lead to damage to heritage assets and such a strong opening statement would seem to undermine the credibility of the policy.</p> <p>The text also states that applications will be assessed with reference to the following:</p> <p>"1. The historic and/or architectural significance of the asset; 2. The prominence of its location and setting; and 3. The historic and/or architectural significance of any elements to be lost or replaced."</p> <p>These three clauses are more appropriate to built heritage than to archaeological or landscape heritage. Many archaeological assets, for example, are buried in woodlands or entirely below the ground and so clause 2 will be inappropriate. Certainly, the significance of an archaeological assets is rarely related to its 'prominence'. Clause 3 would seem to contradict the opening paragraph of the policy.</p>
394	Section 6: Development Management Policies Environment Net Gains for Nature: biodiversity	Policy EN 11	Biodiversity	<p>As part of the Net Gain Task and Finish Group, KCC Biodiversity will be providing more detailed comments to the Borough Council's landscape officer.</p> <p><u>Policy EN11</u></p> <p>KCC is supportive of the inclusion of a Net Gain policy – it links in to the NPPF and the forthcoming biodiversity net gain mandate.</p> <p>It is recommended that the Plan either includes the minimum % of net gain required or specify when that will be agreed (e.g. future SPD).</p> <p>It is recommended that the Plan clarifies how developments can demonstrate that it will result in net gain – e.g. ecological surveys/use of the revised Net Gain Metric</p> <p>It should also be made clear that monitoring will be implemented as part of the net gain process.</p>
397	Section 6: Development Management Policies Environment Protection of Designated Sites and Habitats	Policy EN 12	Biodiversity	<p>It is recommended that the Plan clarifies what information must be submitted to assess the impact on designed sites.</p> <p>The Biodiversity Net Gain Metric cannot be used to assess loss of designated sites – the policy must to be clear on this point.</p> <p>The policy states the following: The need for the development would clearly outweigh the affected nature conservation interest of the site; KCC considers that the policy needs to be strong setting out what "need" means.</p> <p>There is no policy requiring the submission of ecological surveys/mitigation strategies. KCC highlights that currently, the National Biodiversity Net Gain consultation indicates that there will be developments that net gain is not required for - this includes extensions and brown field sites. It should be noted that brownfield sites can have high biodiversity value and buildings may be used by roosting bats. Therefore, areas which may not be required to be considered under the national net gain policy may then be excluded for local net gain policy. KCC highlights that in this situation, there is a need to ensure that there is local policy to ensure appropriate ecological information is submitted to enable the Local Planning Authority to consider the impact associated with the development.</p>
405	Section 6: Development Management Policies Environment	Policy EN 17	Strategic and Corporate Services	<p>Rusthall Green Space – Site Number 226</p> <p>The Rusthall Remote Playing Field (MUGA) for St Pauls School, Edward Street, Rusthall has been combined with the neighbouring land (adjacent to Colbran Way) to form Site 226 "Rusthall Green Space". The County Council does not think it is appropriate to combine the land with the neighbouring</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
	Local Green Space			<p>open space adjacent to Colbran Way. KCC acknowledges that the parcels of land that make up Site 226 are in close proximity to the community served and that neither area is extensive. The County Council is not comfortable that there is adequate evidence offered to support the NPPF requirement for it to be “<i>demonstrably special</i>” and hold “<i>particular local significance</i>” to the local community.</p> <p>The County Council considers that Rusthall MUGA does not meet the tests set for a Local Green Spaces designation in accordance with the National Planning Policy Framework (NPPF) paragraph 100, and therefore should not be allocated as a Local Green Space within the Local Plan.</p>
422	Section 6: Development Management Policies Environment Conservation of Water Resources	Policy EN 27	Sustainable Business and Community	Paragraph 6.261 - KCC fully supports the inclusion of an optional technical standard for water efficiency, which will support delivery of the Kent Environment Strategy.
423	Section 6: Development Management Policies Environment Flood Risk	Policy EN 28	Sustainable Urban Drainage Systems	The Policy requires that a Flood Risk Assessment (FRA) is completed for sites that may be subject to other sources of flooding. KCC is supportive this approach as it provides for technical assessment of sites which may have surface water flooding. KCC requires that such an assessment should be carried out if the site is shown within the EA Map for Surface Water Flooding to have areas within an overland surface water flow path.
426	Section 6: Development Management Policies Environment Sustainable Drainage	Policy EN 29	Sustainable Urban Drainage Systems	This Policy provides detailed requirements for sustainable drainage provision. Therefore, KCC has no further comments on this policy.
			Heritage Conservation	Please see KCC's comments on Sustainable Urban Drainage Systems made in relation to Policy EN 1.
431	Section 6: Development Management Policies Environment Minerals and Waste	Policy EN 32		<p>Following a review of the Kent Minerals and Waste Local Plan Tunbridge Wells Borough-Mineral Safeguarding Areas (that are based on the British Geological survey economic geology data) KCC confirm that there are economic mineral deposits that are potentially threatened with sterilisation by the allocations in the Draft Plan. The relevant potentially economically important mineral deposits are as follows:</p> <ul style="list-style-type: none"> • Superficial Sub-Alluvial River Terrace deposits (river valley terrace sands and gravels) [SARTSSG] • Sandstone-Tunbridge Wells Sand Formation [TWSS] • Sandstone -Ardingly Sandstone Formation [ASS] • Sandstone -Ashdown Formation [ASH] • Limestone- Pauldina Limestone, Weald Clay Formation [PLS] <p>The following proposed development allocations in the Plan have coincidence with one or more of the above safeguarded minerals. They are;</p> <ul style="list-style-type: none"> Land adjacent to Longfield Road <ul style="list-style-type: none"> • RTW12 TWSS Land at Colebrook House <ul style="list-style-type: none"> • RTW13 TWSS Land at Wyevale Garden Centre, Eridge Road <ul style="list-style-type: none"> • RTW16 TWSS SARTSSG Land to the west of Eridge Road at Spratsbrook Farm <ul style="list-style-type: none"> • RTW18 TWSS ASS Land at Culverden Stadium, Culverden Down <ul style="list-style-type: none"> • RTW21 ASS Land at Bayham Sports Field West <ul style="list-style-type: none"> • RTW22 ASH Land at Hawkenbury, off Hawkenbury Road/Maryland Road <ul style="list-style-type: none"> • RTW23 TWSS

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>Land at Cemetery Depot, Benhall Mill Road</p> <ul style="list-style-type: none"> • RTW26 ASH <p>Land at Hawkenbury, off Hawkenbury Road/Maryland Road</p> <ul style="list-style-type: none"> • RTW27 TWSS <p>Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)</p> <ul style="list-style-type: none"> • SO2 TWSS <p>Land at Mabledon and Nightingale</p> <ul style="list-style-type: none"> • SO3 ASS <p>Land at Mabledon House</p> <ul style="list-style-type: none"> • SO4 TWSS <p>Tudeley Village</p> <ul style="list-style-type: none"> • CA1 TWSS <p>Land to east of Tonbridge/west of site for Tudeley Village (strategy Policy STR/CA1 does recognise the proximity of Mineral Site Plan allocations at Moat Farm and Stonecastle Farm)</p> <ul style="list-style-type: none"> • CA2 TWSS SARTSSG <p>Land at Capel and Paddock Wood</p> <ul style="list-style-type: none"> • PW1-1 TWSS • PW1-2 TWSS • PW1-7 SARTSSG • PW1-12 SARTSSG <p>Land adjoining Wisley Farm, adjacent to Angley Road/Whitewell Road</p> <ul style="list-style-type: none"> • CRS1 TWSS <p>Playing field adjacent Quakers Lane/Waterloo Road</p> <ul style="list-style-type: none"> • CRS2 TWSS <p>Jaegers Field, Angley Road</p> <ul style="list-style-type: none"> • CRS4 TWSS <p>Turnden Farm, Hartley Road</p> <ul style="list-style-type: none"> • CRS4 TWSS (limited) <p>Land Adjoining Cranbrook Primary School, Quaker Lane</p> <ul style="list-style-type: none"> • CRS5 TWSS <p>Land at Gate farm, adjacent to Hartley Road and Glassenbury Road, Hartley</p> <ul style="list-style-type: none"> • CRS6 TWSS <p>Land at Golford Road</p> <ul style="list-style-type: none"> • CRS7 TWSS <p>Land adjacent to the Crane Valley</p> <ul style="list-style-type: none"> • CRS9 TWSS and SARTSSG (minor impact) <p>Land at Mill lane</p> <ul style="list-style-type: none"> • CRS 12 TWSS <p>Land at Camden Lodge, adjacent to Mill Lane</p> <ul style="list-style-type: none"> • CRS13 TWSS <p>Land South of the Street</p> <ul style="list-style-type: none"> • CRS14 TWSS <p>Wilsley Road</p> <ul style="list-style-type: none"> • CRS15 TWSS <p>Land at Boycourt Orchards, Wilsely Road</p> <ul style="list-style-type: none"> • CRS16 TWSS <p>Land adjacent to Orchard Cottage</p> <ul style="list-style-type: none"> • CRS17 TWSS <p>Hawkhurst Golf Course</p> <ul style="list-style-type: none"> • HA1 TWSS and SARTSSG (minor impact) <p>Land east of Hartenoak</p> <ul style="list-style-type: none"> • HA2 TWSS

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>Land at Fowlers Park</p> <ul style="list-style-type: none"> • HA4 TWSS <p>Slip Hill Road</p> <ul style="list-style-type: none"> • HA8 TWSS <p>Land at Santers Yard, Gills Green Farm</p> <ul style="list-style-type: none"> • HA9 TWSS <p>Land at Limes Grove, Hawkhurst</p> <ul style="list-style-type: none"> • HA10 TWSS <p>Beneden Hospital</p> <ul style="list-style-type: none"> • BE4 TWSS <p>Land between Brenchley Road, Coppers Road, Maidstone Road</p> <ul style="list-style-type: none"> • BM1 TWSS <p>Matfield House, the Green</p> <ul style="list-style-type: none"> • BM2 TWSS <p>Ashes Plantation, Matfield</p> <ul style="list-style-type: none"> • BM3 TWSS <p>Land at Maidstone Road</p> <ul style="list-style-type: none"> • BM4 TWSS <p>Land at Cranbrook Road</p> <ul style="list-style-type: none"> • FR1 PLS <p>Land adjacent to Balcombes Hill and adjacent to Tiddymotts Lane</p> <ul style="list-style-type: none"> • GO1 TWSS <p>Land at Triggs Farm, Cranbrook Road</p> <ul style="list-style-type: none"> • GO2 TWSS <p>Land at Furnace Lane/Gibbet Lane</p> <ul style="list-style-type: none"> • HO1 TWSS <p>Land East of Horsmonden</p> <ul style="list-style-type: none"> • HO3 TWSS <p>Land to the west of Spray Hill</p> <ul style="list-style-type: none"> • LA1 TWSS <p>Land at Misty Meadow/Furnace lane</p> <ul style="list-style-type: none"> • LA2 TWSS <p>Land at Chalket Lane</p> <ul style="list-style-type: none"> • PE1 TWSS <p>Hubbles Farm, Hastings Road</p> <ul style="list-style-type: none"> • PE2 TWSS <p>Land North of the A21, Hastings Road</p> <ul style="list-style-type: none"> • PE3 TWSS <p>Downingbury farm, Maidstone Road</p> <ul style="list-style-type: none"> • PE4 TWSS <p>Land at Sturgeons front, Henwood Green Road</p> <ul style="list-style-type: none"> • PE5 ASS <p>Tunbridge Wells Hospital</p> <ul style="list-style-type: none"> • PE6 ASS <p>Woodgate Corner (partly within urban area that is exempt)</p> <ul style="list-style-type: none"> • PE7 ASS <p>Land south of Sayville Road, Rye Road and west of Marsh Quarter Lane</p> <ul style="list-style-type: none"> • SA1 TWSS <p>Land at Old Orchard and Stream Pit lane</p> <ul style="list-style-type: none"> • SA2 TWSS <p>Land west of Speldhurst Road and south of Ferbies</p> <ul style="list-style-type: none"> • SP1 ASS <p>Land north of Langton House</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<ul style="list-style-type: none"> • SP2 ASS <p style="text-align: center;">Land adjacent to Rusthall recreation ground, Southwood Road</p> <ul style="list-style-type: none"> • SP3 ASS <p>The safeguarding of these potentially economic minerals is required by Policy CSM 5 of the adopted KMWLP 2013-30. The County Council recognises the inclusion of paragraph 6.295 and Policy EN 32 -Minerals and Waste.</p> <p>The Draft Local Plan does not evidence that any assessments against the criteria of Policy DM 7, have been carried out to determine if there are grounds for exemption from the presumption to safeguard the potentially affected minerals. It could, be argued that this makes the Draft Plan deficient against the adopted policies of the Development Plan (that includes the KMWLP). However, given the economic resources affected, it is possible that an argument could potentially be advanced that the sandstone formations, as listed below are not threatened with sterilisation in any meaningful manner as they are massive crustal sedimentary units that do not require a maintained landbank in the County as do aggregate minerals:</p> <ul style="list-style-type: none"> • Sandstone-Tunbridge Wells Sand Formation [TWSS] • Sandstone - Ardingly Sandstone Formation [ASS] • Sandstone Ashdown Formation [ASH] <p>These minerals were used historically as a local building material. There are no modern planning permissions for the quarrying of these materials in Kent and there are two quarrying operation in West Sussex that produce specialist building materials from these sandstone formations. It is known that these operators supply sandstone construction materials (paving slabs, blocks, and other specialist building components) for specialist bespoke building projects and historic building restoration. Given that the demand is probably being met from these operators in West Sussex and that the amount of sterilisation in Kent in comparison to the geographical extent of these massive crustal geologies, it is not considered that supply of specialist building stone, of this type, is likely to be compromised in the future. The Draft Plan should make reference to this to ensure it demonstrates that it has considered the matter.</p> <p>With regard to the superficial Sub-Alluvial River Terrace deposits (river valley sands and gravels), again the Draft Plan is silent on their safeguarding. Though the coincidence of this aggregate mineral with the number of proposed allocations is not significant, the sites where it occurs should reference the need for Mineral Assessments to determine if the mineral is indeed of economic character and can potentially be prior extracted ahead of any development of the site. Essentially the tests of Policy DM 7 should be referenced in this regard.</p> <p>Only one allocation is coincident with the safeguarded Pauldina Limestone, Weald Clay Formation (Land at Cranbrook Road, Allocation FR1). This is a specialist building material that is of importance due to its use in historic ecclesiastical buildings. The geological unit is not widespread, unlike the sandstones, though not in high demand due to its use in historic restoration. There is no requirement to maintain a landbank and there are limited or no records of where, historically, this material was extracted in Kent. It is considered that the allocation, in all probability, does not threaten the supply of this material. However, the Draft Plan should make reference to this safeguarded geology in this context.</p> <p>With regard to safeguard waste management and mineral processing and transportation infrastructure (safeguarded by Policies CSW 16, CSM 7 of the adopted KMWLP) the Draft Plan is essentially silent (apart from Policy EN 32 above). KCC confirms that proposed allocation RTW 12 North Farm/Longfield Road is within 250 metres of Mid Kent Metal Recycling Ltd, Skip Hire/Omni Recycling, North Farm Waste Recycling Facility (adjacent to the former North farm Landfill Site) and the waste water treatment works at North Farm Lane. The allocation is for B1 (a) B2 (b) and B8 Use Classes, not residential. However, there still may be a degree of impact of these lawfully operating waste uses on the proposed allocation. The Draft Plan should identify that an Infrastructure Assessment should be undertaken to establish whether or not the proposed uses are compatible with the established lawful and safeguarded waste activities. This is set out in Policy DM 8 of the KMWLP.</p> <p>The County Council has submitted a Mineral Sites Local Plan to the Secretary of State, the examination of which is currently undergoing. This Plan identifies two allocations in the vicinity of the proposed Tudeley Village allocation (CA1). While it is noted that the strategic policy STR/CA1 of the Draft Plan does make the point that this allocation is in the vicinity of the mineral site allocations, and should have regard to them, it is unclear as to whether there may be any conflict with these mineral site allocations and/or their accessibility in the future (assuming all are adopted in the respective plans). Or whether it is considered that there is any significant potential for adverse impacts on their future potential to supply mineral to the market in a steady and adequate way, as required by the NPPF (see para. 207). Given the implications for mineral and waste safeguarding and the need for both local planning authorities to work together on this strategic matter, KCC would welcome the Borough Council keeping the County Council as Minerals and Waste Planning Authority informed of the Local Plan progress.</p>
444	Section 6: Development Management Policies	Policy H 9	Provision and Delivery of	In respect of older persons care homes, for residential care, it is important to support older persons' care homes in the areas where there is a need for specific support. High quality dementia care, particularly for people with dementia that presents as challenging is needed in across Kent, including

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary																																																																																																																																																														
	Housing Housing for Older People		County Council Community Services and Strategic Commissioning	<p>Tunbridge Wells. The second key area is high quality nursing care that is affordable. In Tunbridge Wells at present, the average cost for care home beds is significantly higher than the Kent average.</p> <p>The Local Plan should also reference Your Life Your Well-Being which is Kent County Council’s strategy for Adult Social Care.</p> <p>Its vision is ‘To help people to improve or maintain their well-being and to live as independently as possible’ and is achieved through three themes.</p> <ol style="list-style-type: none"> 1. Promoting well-being 2. Promoting independence 3. Supporting independence <p>The vision is that people should live independently in their own home receiving the right care and support and it sets out the strategic direction for suitable housing and care home provision for all Adult Social Care client groups. The strategy concludes a need for more extra care housing and exploring the opportunities to develop mixed tenure models of extra care housing.</p> <p><u>For Extra Care housing</u></p> <p>Typically KCC Social Care is increasingly minded to use section 106 contributions for supporting the capital expenditure for the build of Extra Care accommodation, which will also use a combination of funding streams.</p> <p>Following table shows forecast demand showing places required for Extra Care accommodation to 2031 across all districts with Tunbridge Wells shown (currently a gap of 138 places):</p> <table border="1"> <thead> <tr> <th rowspan="3">District</th> <th colspan="4">Supply (Units)</th> <th colspan="5">Demand</th> </tr> <tr> <th colspan="4">Updated June 2018</th> <th colspan="5">65 years + Single Forecasting System (SFS)</th> </tr> <tr> <th>Current Position</th> <th>Planning Permissions Granted/ Under Construction</th> <th>Applications and Proposals</th> <th>Total Potential Supply</th> <th>2021</th> <th>2026</th> <th>2031</th> <th>Total Estimated Demand 2031</th> <th>Gap in Supply for Demand</th> </tr> </thead> <tbody> <tr> <td>Ashford</td> <td>181</td> <td>0</td> <td>80</td> <td>261</td> <td>257</td> <td>365</td> <td>428</td> <td>428</td> <td>167</td> </tr> <tr> <td>Canterbury</td> <td>40</td> <td>157</td> <td>50</td> <td>247</td> <td>175</td> <td>315</td> <td>388</td> <td>388</td> <td>141</td> </tr> <tr> <td>Dartford</td> <td>80</td> <td>0</td> <td>0</td> <td>80</td> <td>122</td> <td>192</td> <td>226</td> <td>226</td> <td>146</td> </tr> <tr> <td>Dover</td> <td>161</td> <td>69</td> <td>0</td> <td>230</td> <td>251</td> <td>361</td> <td>423</td> <td>423</td> <td>193</td> </tr> <tr> <td>Gravesham</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>186</td> <td>253</td> <td>281</td> <td>281</td> <td>281</td> </tr> <tr> <td>Maidstone</td> <td>97</td> <td>0</td> <td>18</td> <td>115</td> <td>218</td> <td>358</td> <td>431</td> <td>431</td> <td>316</td> </tr> <tr> <td>Sevenoaks</td> <td>52</td> <td>48</td> <td>51</td> <td>151</td> <td>120</td> <td>213</td> <td>256</td> <td>256</td> <td>105</td> </tr> <tr> <td>Folkstone and Hythe</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>142</td> <td>252</td> <td>309</td> <td>309</td> <td>309</td> </tr> <tr> <td>Swale</td> <td>51</td> <td>0</td> <td>0</td> <td>51</td> <td>149</td> <td>264</td> <td>325</td> <td>325</td> <td>274</td> </tr> <tr> <td>Thanet</td> <td>89</td> <td>0</td> <td>0</td> <td>89</td> <td>205</td> <td>333</td> <td>403</td> <td>403</td> <td>314</td> </tr> <tr> <td>Tonbridge and Malling</td> <td>0</td> <td>180</td> <td>0</td> <td>180</td> <td>99</td> <td>195</td> <td>244</td> <td>244</td> <td>64</td> </tr> <tr> <td>Tunbridge Wells</td> <td>48</td> <td>89</td> <td>20</td> <td>157</td> <td>141</td> <td>239</td> <td>295</td> <td>295</td> <td>138</td> </tr> <tr> <td>TOTAL</td> <td>799</td> <td>543</td> <td>219</td> <td>1,561</td> <td>2,065</td> <td>3,340</td> <td>4,009</td> <td>4,009</td> <td>2,448</td> </tr> </tbody> </table> <p>In terms of Social Care, it is therefore <u>imperative</u> that the Borough Council understands and supports new government legislation that all future housing must be built to Building Reg Part M4(2) standard – see following narrative:</p> <p><i>The Ministry of Housing, Communities and Local Government identified in June 2019 guidance Housing for older and disabled people the need to provide housing for older & disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely. Accessible and adaptable housing provides safe and convenient homes with suitable circulation space and suitable bathroom and kitchens. Kent Social Care request these dwellings are built to Building Reg Part M4(2) standard to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupant’s requirements.</i></p> <p><u>Developer contributions (s.106) for KCC Social Care</u></p> <p>In light of the increasing client numbers and desire to promote independence within this group, KCC has reviewed the projects it seeks s.106 contributions for, resulting in five priorities:</p> <ol style="list-style-type: none"> 1. Provision of Specialist Housing 	District	Supply (Units)				Demand					Updated June 2018				65 years + Single Forecasting System (SFS)					Current Position	Planning Permissions Granted/ Under Construction	Applications and Proposals	Total Potential Supply	2021	2026	2031	Total Estimated Demand 2031	Gap in Supply for Demand	Ashford	181	0	80	261	257	365	428	428	167	Canterbury	40	157	50	247	175	315	388	388	141	Dartford	80	0	0	80	122	192	226	226	146	Dover	161	69	0	230	251	361	423	423	193	Gravesham	0	0	0	0	186	253	281	281	281	Maidstone	97	0	18	115	218	358	431	431	316	Sevenoaks	52	48	51	151	120	213	256	256	105	Folkstone and Hythe	0	0	0	0	142	252	309	309	309	Swale	51	0	0	51	149	264	325	325	274	Thanet	89	0	0	89	205	333	403	403	314	Tonbridge and Malling	0	180	0	180	99	195	244	244	64	Tunbridge Wells	48	89	20	157	141	239	295	295	138	TOTAL	799	543	219	1,561	2,065	3,340	4,009	4,009	2,448
District	Supply (Units)					Demand																																																																																																																																																												
	Updated June 2018					65 years + Single Forecasting System (SFS)																																																																																																																																																												
	Current Position	Planning Permissions Granted/ Under Construction	Applications and Proposals	Total Potential Supply	2021	2026	2031	Total Estimated Demand 2031	Gap in Supply for Demand																																																																																																																																																									
Ashford	181	0	80	261	257	365	428	428	167																																																																																																																																																									
Canterbury	40	157	50	247	175	315	388	388	141																																																																																																																																																									
Dartford	80	0	0	80	122	192	226	226	146																																																																																																																																																									
Dover	161	69	0	230	251	361	423	423	193																																																																																																																																																									
Gravesham	0	0	0	0	186	253	281	281	281																																																																																																																																																									
Maidstone	97	0	18	115	218	358	431	431	316																																																																																																																																																									
Sevenoaks	52	48	51	151	120	213	256	256	105																																																																																																																																																									
Folkstone and Hythe	0	0	0	0	142	252	309	309	309																																																																																																																																																									
Swale	51	0	0	51	149	264	325	325	274																																																																																																																																																									
Thanet	89	0	0	89	205	333	403	403	314																																																																																																																																																									
Tonbridge and Malling	0	180	0	180	99	195	244	244	64																																																																																																																																																									
Tunbridge Wells	48	89	20	157	141	239	295	295	138																																																																																																																																																									
TOTAL	799	543	219	1,561	2,065	3,340	4,009	4,009	2,448																																																																																																																																																									

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p>2. Changing Places 3. Adapting Community Facilities 4. Digital Technology 5. Sensory Facilities</p> <p>It is this change to care provision that has resulted in an increase in the s.106 contributions being requested from Quarter 3 2019. These contributions will be requested for the five priorities above and will be calculated per dwelling.</p>
465	Section 6: Development Management Policies Employment Digital Communications and Fibre to the Premises (FTTP)	Policy ED 3	Broadband	<p>KCC welcomes the inclusion of policy ED 3 (Digital Communications and Fibre to the Premises) as there is a need to ensure that new development has either full fibre (FTTP) or gigabit capable connections.</p> <p>Given the recent shift in Government policy (set out in the Future Telecoms Infrastructure Review) from superfast speeds (in excess of 24mbps) to 'gigabit-capable' speeds (delivered either via wired i.e. FTTP or wireless solutions) KCC would request that the references to 24mbps, high speed and 'next generation-access' are replaced with the term 'gigabit-capable'. This will help ensure that the plan is in keeping with current and emerging national digital infrastructure policy.</p> <p>KCC also believes, given the increasing importance of mobile connectivity, that developers should be strongly encouraged, at an early stage, to discuss mobile coverage and capacity with mobile network operators to ensure that new development has the mobile connectivity that businesses and residents would expect.</p>
488	Section 6: Development Management Policies Transport and Parking Transport Assessments, Travel Plans, and Mitigation	Policy TP 1	Highways and Transportation	<p>Paragraph 6.511 - Instead of this paragraph and subsequent table, following text should be provided:</p> <p><u>Transport assessments and travel plans will be expected to accompany all planning applications for new developments where the location of the development has existing traffic issues or lack of transport infrastructure, or in any circumstances at the request of KCC Highways. Where appropriate, new development proposals will be expected to enter into legal agreements to secure the delivery of mitigation to address both their direct and cumulative impacts on the transport network. The Local Planning Authority may also seek to secure construction and environment management plans (as requested and developed with Kent County Council) to minimise impacts from new major developments during construction.</u></p> <p><u>Policy TP 1</u></p> <p>The Local Highway Authority conditionally supports this policy.</p> <p>The following amends should be made:</p> <p>Paragraph 1 – “Demonstrate that the impacts of trips generated to and from the development are <u>accommodated or mitigated to prevent significant impacts, including where necessary an exploration of delivering mitigation measures ahead of the development being occupied; and</u>”</p> <p>Paragraph 2 “Provide a satisfactory Transport Assessment for <u>proposals as required by KCC Highways</u> “ (see paragraph 6.511 above).</p> <p>The County Council also requests the inclusion of the following wording:</p> <p><u>Where adequate transport infrastructure is not available to serve the development, the Local Planning Authority will seek the provision of, or contributions towards, appropriate measures that will address the identified inadequacy, and which will enable active travel and provide other highway improvements. As such, where a proposal necessitates highway improvements, the developer will be required to meet the cost of the improvements and deliver the identified scheme where these are fairly and reasonably related to the development.</u></p> <p>It should also be noted that the County Council considers that point 3 should be deleted as a development should comply with all relevant policies, not just this one. KCC also considers that is no need for paragraph beginning “Furthermore, all development...” as this is repetition of paragraph 2.</p>
			Public Rights of Way and	<p>While the general content of this Transport Policy is supported, additional consideration should be given to the impact of development on Non-Motorised Users (NMUs) along rural lanes. This is because rural lanes provide useful connections for NMUs travelling between off-road PRoW routes. The potential</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Access Service	for increased vehicular traffic along these quiet country lanes, resulting from development, is therefore a concern. Increased vehicle movements could introduce safety concerns for NMUs and potentially deter public use of the PRow network. Applications for development should therefore be expected to include traffic impact studies. Where negative impacts are identified, developers should provide or contribute towards appropriate mitigation measures.
489	Section 6: Development Management Policies Transport and Parking Transport Design and Accessibility	Policy TP 2	Highways	<p>Paragraph 6.512 - The recommended amendments are as follows:</p> <p>“The design of new development plays an important role in making it a sustainable place. Good design will ensure it is safe for all users and reduce the impact on the surrounding road network, as well as creating a high quality built environment that enhances the public realm and conserves the character of historic routes and the public realm, which greatly contribute to the attractive character of the borough. Equally, the design of our neighbourhoods can influence physical activity levels, travel patterns, social connectivity, mental and physical health, and wellbeing outcomes. <u>The Council will apply the appropriate highway guidance on an individual scheme basis that takes into account local context....</u>”</p> <p>The above amendment has removed the list of documents for reference as this is not a conclusive list and is likely to change during the plan period.</p> <p>Paragraph 6.513</p> <p>The recommended amendments are as follows:</p> <p>“All developments must also be designed in a way that accommodates and enables sustainable travel, including active travel and public transport as alternative modes of transport to the private car. Developments must therefore have safe and secure accessibility for all modes of transport, as well as ensuring permeability through the site, including, where possible, maintenance and enhancement of, and/or linkages to, <u>public footway network</u>, public rights of way or the local strategic cycle network.”</p> <p>The rest of the paragraph is not considered required by KCC as it repeats that which has already been covered.</p> <p>Policy TP 2</p> <p>The following amends are recommended:</p> <p>Paragraph 1 – “The development is accessible to all and permeable by all relevant modes of transport, with priority given to active forms of travel in accordance with the Kent County Council’s Design Guide. This will include suitable arrangements for access by large vehicles. This will take account of public transport (buses), goods, emergency, and waste collection vehicles for delivery, servicing, and drop-off. The development must also be able to accommodate the swept path of vehicles on proposed new infrastructure. This should include the largest vehicles expected to access the area; and”</p> <p>Paragraph 2 - <u>There is pedestrian access to public transport services and infrastructure;</u></p> <p>Paragraph 3 – “If located on, or adjacent to, an identified cycle route, the development will provide a segregated link to (via the development site), the cycle route with reference to the Council’s latest Cycling Strategy. Maintenance will be delivered through commuted sums to Kent County Council; and)”</p> <p>Paragraph 4 - <u>The existing public footway network and the public rights of way network should be safeguarded. Any re-routing of these will be permitted provided that the network is overall enhanced. The development should provide new footway links to connect to or enhance the existing local network. Where appropriate, financial contributions to improvements to off-site public rights of way, including signage, will be sought; and</u></p> <p>Paragraph 5 - “Roads and junctions within the development, <u>and those to be altered or added as a result of the development</u>, are designed and delivered in...”</p>
			Public Rights of Way and Access Service	Paragraph 4 reads that PRow diversions to enable development will only be permitted if the overall network is enhanced. While the intentions of this statement maybe positive, the text will need to be revised. This is because it may not always be feasible for development to positively enhance the overall PRow network. Suggested text below:

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
				<p><i>“Where already in existence, the PRow network should be safeguarded. Development should secure positive outcomes for the PRow network, adhere to good design principles and contribute towards the delivery of ROWIP objectives. Opportunities should be taken through development to enhance the PRow network, including improvements to signage, surfacing and the creation of new path links that improve connectivity. Where appropriate, financial contributions for off-site PRow improvements will be sought”</i></p> <p>It is also requested that additional text is inserted into the policy wording, stipulating that applicants for new developments engage with the KCC PRow and Access Service at the earliest opportunity. This would allow the County Council to review proposals for access improvements (including PRow diversions) and consider appropriate financial contributions for off-site PRow network enhancements.</p>
492	Section 6: Development Management Policies Transport and Parking Parking Standards	Policy TP 3	Highways and Transportation	<p>It would be beneficial if KCC standards and Borough Council's proposed standards converged. In line with proposed new KCC parking standards, this would mean a requirement of two spaces where TP3 asks for 1.5 spaces, and bringing the 2.5 spaces for a 4-bed house down to 2 spaces. It is suggested that the word 'Mandatory' is changed to 'Maximum' to allow less parking where appropriate.</p> <p>Also, it should be noted that the new KCC Parking standards state: In suburban and rural locations in particular, the Local Highway Authority will not count garages as formal car parking spaces.</p>
496	Section 6: Development Management Policies Transport and Parking Public Car Parks	Policy TP 4	Highways and Transportation	The Local Highway Authority is supportive of this policy.
498	Section 6: Development Management Policies Transport and Parking Railways	Policy TP 5	Highways and Transportation Public Rights of Way and Access Service	<p>The Local Highway Authority is supportive of this policy.</p> <p>Inclusion of this policy text, that safeguards the 'Hop Pickers' Line, is supported.</p>
499	Section 6: Development Management Policies Transport and Parking Safeguarding Roads	Policy TP 6	Highways and Transportation	KCC agrees with Colts Hill and A21 safeguarding, as work has been done on possible alignments and feasibility studies have commenced. However, if Halls Hole Road is to feature in this policy, a number of other potential road widening schemes should also feature i.e. Cornford Lane, Reynolds Lane, railway bridge at North Farm etc. Consideration of these are required.
503	Section 6: Development Management Policies Open Space, Sport, and Recreation The provision of publicly accessible open space and recreation	Policy OSSR 2	Public Rights of Way and Access Service	<p>Additional wording should be included within this policy text to ensure that publicly accessible open space and recreation opportunities are easily accessible to everyone. There should be sustainable transport connections available, so that visitors are not dependant on private vehicle use to access these sites.</p> <p>To encourage active travel, there should be good walking and cycling connections with open spaces. Alternatively, good public transport links with open spaces should be made available, so that the public are not dependent on private vehicle use for visiting these sites. Development should be expected to provide or contribute towards the creation of new sustainable transport links if necessary.</p> <p>Studies have shown that green spaces provide considerable health and well-being benefits for the public, but these spaces will face increasing pressures from new developments and a growing population. There is a risk that the attractive qualities of green spaces will deteriorate, unless appropriate steps are put in place to protect the sites and manage access. To cope with the increasing demands of a growing population, it is recommended that the Local Plan seeks an increase in open space provision above that currently sought.</p> <p>Research has also identified a correlation between deprivation, access to greenspace and good health, where less deprived areas have good access to green space and better health. Local populations with a relatively high level of physical inactivity have limited access to natural greenspace that is 'close to home'. The Local Plan for Tunbridge Wells should therefore aim to increase the provision of accessible green spaces and improve opportunities to access this resource in relatively deprived areas.</p>

APPENDIX 1: KCC response: schedule of technical comments –Tunbridge Wells Local Plan Consultation October 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
			Kent Sport and Physical Activity	<p>It is important to ensure that these strategies and any subsequent developments take account of the Sport England Guidance that is available as follows:</p> <ul style="list-style-type: none"> > https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/ > https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/ > https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/ > https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/ > https://www.sportengland.org/facilities-planning/active-design/ <p>All are relevant, but of particular interest may be the final two regarding Sport England's Facilities Planning model and Active Design guidance. It is also worth raising that Government's and Sport England's strategies for sport are very much focussed on tackling inactivity and supporting/encouraging under-represented groups to be active. Through the national Active Lives Survey, latest figures from April 2019 show that, 25.1% of people nationally are inactive. In Tunbridge Wells this figure is 18.1% and this contributes to significant impact on physical and mental health, as well as individual and social/community development. Therefore, any development needs to consider this and seek to provide a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes, open spaces and water based activity.</p>