

## Comment

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| <b>Consultee</b>   | Mrs Nicole Godwin (24878)                                   |
| <b>Email Address</b>   | hawkhurstpc@btconnect.com                                   |
| <b>Address</b>   | The Office At The Moor<br>The Moor<br>CRANBROOK<br>TN18 4NT |
| <b>Event Name</b>  | Local Plan Issues and Options                               |
| <b>Comment by</b>  | Mrs Nicole Godwin   |
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| <b>Version</b>   | 0.1   |
| <b>Question 1</b>  |   |
| <b>Do you agree with the new draft Vision for the borough?</b> | No  |

## Question 2

**What suggestions do you have for improving or updating the draft Vision and relating it to 2033?**

Add after "...in a sustainable way" – "and having regard to the constraints presented by the AONB and the Metropolitan Green Belt."

## Question 4

**Do you think these are the right Objectives?**

Yes

## **Question 6a**

### **Natural and Built Environment**

**Have we identified the main environmental issues facing the borough?** No

## **Question 6b**

**If No, what environmental issues do you think are missing?**

No mention has been made of light pollution, which is an important issue for dark skies in rural areas, despite it being highlighted in the Landscape Character Assessment 2017.

## **Question 6c**

### **Infrastructure**

**Have we identified the main infrastructure issues facing the borough?** Yes

## **Question 6e**

### **Housing**

**Have we identified the main housing issues facing the borough?**

**No**

## Question 6f

**If No, what housing issues do you think are missing?**

No mention has been made of specific provision for disabled adapted housing.



## **Question 6g**

### **Economy**

**Have we identified the main economic issues facing the borough?**

Yes

## **Question 6i**

### **Transport and Parking**

**Have we identified the main transport and parking issues facing the borough?** No

## Question 6j

**If No, what transport and parking issues do you think are missing?**

The rural problem of HGV routing is not addressed as a strategy for the next 20 years. It is especially severe in Hawkhurst. Also, there should be a parking strategy for rural areas as well as central Royal Tunbridge Wells, where it is also a problem. Particulate reduction from diesels is not addressed. Finally, at the end of 4.35, after Colt's Hill, please add 'and the intersection of the A268 and A229'.

## **Question 6k**

### **Leisure and Recreation**

**Have we identified the main leisure and recreation issues facing the borough? No**

## **Question 6I**

**If No, what leisure and recreation issues do you think are missing?**

There is a lack of mention of provision for the arts in rural areas.

## Question 6m

### Sustainability

**Having regard to the Sustainability Appraisal Scoping Report, have we identified the main sustainability issues facing the borough?**

No

## Question 6n

### **If No, what sustainability issues do you think are missing?**

There should be a policy for adequate recycling facilities right across the borough, including rural settlements. There should also be a policy for greater and more effective monitoring of air pollution, particularly in areas of traffic congestion, even in rural settlements.

## **Question 7**

### **Cross-boundary Strategic Planning**

**Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?**      **No**



## Question 7a

**If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?**

Yes - at 5.1, after 'transport connections with Maidstone' please add 'and Rother'.

## **Question 8**

### **Settlement Groupings**

**Do you agree with the suggested groupings of settlements?** No

## Question 8a

**If No, what changes do you suggest to the groupings of settlements and why?**

This is an extremely flawed methodology. It is an illogical means of providing an indication (even a theoretical indication) of the level of sustainability and appropriateness of any settlement to accommodate further growth because the status of the range of services and facilities available is highly unstable. The concept and logic is deeply flawed. Some small settlements could take proportionally more housing and probably be re-vitalised as a result. An unsuitable method for allocating 13,000 houses across the Borough.

## **Question 9**

### **Development Boundaries**

**Should the policy approach of defining settlement  
'Limits to Built Development' continue in  
principle?**      **Yes**

## Question 9a

**Should the defined Limits to Built Development as currently drawn be retained in their current form in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?**

Should be retained

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| <b>Question 9b</b>        |   |

### **If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?**

The previous Local Plan (2006) uses LBDs to control growth around all urban areas and villages aiming to prevent the unrestricted sprawl into the surrounding countryside and to maintain the separate identity and character of settlements and prevent their coalescence and the erosion of largely undeveloped gaps. These stated aims still stand and this control mechanism which has been very effective is, if anything, needed now more than ever. For all the reasons in the previous LP (ref: 3.5-3.10, 3.39 & 3.40) the LBDs should be retained in principle and in their current form to continue to protect and maintain the settlement patterns.

An LBD provides a defined boundary, carefully drawn in accordance with the criteria in the previous Local Plan (2006), and includes allocated sites showing where development is expected. It also shows where exceptional, justifiable development may be accommodated without a free-for-all approach which would devastate the Kent countryside. To quote section 3.39 "Once taken for built development, the countryside cannot be easily replaced or restored". The Sustainability Assessment of LP (2006) Policies H5, H8-11, H13 and T3 demonstrate the policies' stature and effectiveness and they should be retained. Any proposed changes to existing LBDs should be consulted with local communities. LBDs should remain.

## Question 10

Please let us know your preferred Options in order of preference, where 1 is most preferred and 5 is least preferred.

Alternatively, you can tick the 'a combination of options' box and state your preferred combination of Options in Question 10a.

**Preference 1**

A combination of options

## **Question 10a**

**If you prefer a combination of options, please state which ones.**

Option 4 in parallel with Option 5.



## Question 11

**What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?**

A new settlement would require proper infrastructure from the start. It needs clear limits and it should be near a railway line. Excellent transport links are a priority.

## **Question 11a**

**Where do you think a possible new settlement could be located?**

Ideally outside of the AONB but it must have particularly good transport links.

## **Question 12**

**Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?**      **No**

## Question 12a

**If No, please set out what other options for accommodating future development growth within the borough you think should be considered.**

Challenging the Objectively Assessed Need has not yet been addressed.

### **Question 13**

**Which policies do you consider are suitable for continued use?**

LBD1, EN4, EN5, EN8, EN10, EN11, EN15, EN20, EN21, EN22, CR3, CR12, H1, H5, H8, H9, H10, H11, H13, ED5, T3, R6, CS6, TP4, TP8

## **Question 14**

**Which policies do you think may be out of date or no longer necessary?**

H7, TP10, TP11, TP26 – all very out of date.

## Question 15

### Which policies do you think could be updated or amended, and how?

EN6 - add Hawkhurst Colonnade  
EN13 - removed trees should be replaced by another (more than one?) and cut down only if an ALTERNATIVE SITE is not available  
EN23 - Add Hawkhurst - it's green bordered approaches, particularly along the ridge, are part of its character  
Replace EN2, EN14, EN26, EN27 and EN28 with updated policies.  
Add new policies for:  
Street lighting (EN) – to align with modern thinking on “dark skies”. Replace street lighting with sustainable path lighting because vehicles don't need lighting, people do. Outside urban areas (not including village centres or LBDs) no lighting should be required and instead it should be discouraged.  
A21/M26 junction (TP) – joint strategy needed with adjoining boroughs to re-route HGVs at reduced diesel consumption (due to steady optimum speed) and less damage to settlements on cross country routes.  
Technology (ED) – to facilitate local IT and communications based industries.  
NOTE: Hawkhurst (referred to in TP & ED) is not a small rural town or a rural service centre as its road infrastructure is overloaded and communications consequently very poor. Bus services are poor and run severely restricted hours. There is no station, the nearest 6 miles away by car. Car parking is extremely limited to convenience stores (1.5 hrs) and Fowlers Park school parking only. Anything else is “on road” parking making the traffic issue worse.

## Question 18

**Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?**

There should be a policy that states that the **CONTEXT** of a site and its surroundings should be considered **FIRST** and the detail within it **SECOND**.



## Question 19

**Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.**

The 2016 Parking Study does not adequately express the intensity of the parking problems experienced in Hawkhurst. Only a token number of spaces are publicly available now at Northgrove Road, the supermarket car parks are private and restricted stay and Fowlers carpark is used by school parents due to its location by the primary school and is often full, causing overspill into narrow residential roads. There is no long-stay parking for people in local employment, causing further overspill into narrow local residential roads. This needs to be understood and included in policy for the coming 20 years.

Settlement and Function Study – this study part of the evidence base is flawed by mathematical error. It is based on facts supplied by Parish Councils including Hawkhurst. Hawkhurst Parish Council was asked to complete two forms: one for Highgate and one for The Moor. Following submission, after scoring, and without any further contact with the Parish Council, the two scores were added together. This is invalid and negates the facts - a number of which now exceed your stated maxima. Hawkhurst therefore scores very high – incorrectly.