

planning  
transport  
design  
environment  
infrastructure

Response to Inspector's Issues & Questions: Matter 7 Response  
on behalf of Caenwood Estates

May 2022 JB/12377



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# 1 Introduction

## 1.1 Background

1.1.1 This Statement has been prepared by DHA Planning on behalf of Caenwood Estates Ltd in response to the Inspector's Questions on Matter 7 (Residential Site Allocations) in respect of the Tunbridge Wells Borough Council Local Plan Examination.

1.1.2 Caenwood Estates is promoting land at Caenwood Farm and Whitegates Farm on the western edge of Royal Tunbridge Wells, close to Southborough town centre, for a comprehensive, residential-led mix of uses. The site was promoted via the original call for sites process in 2016 (site reference 30) and in the 2017 Regulation 18 consultation. Part of this land has been proposed for allocation, together with neighbouring land promoted by Dandara, under reference AL/RTW5.

1.1.3 As set out in our previous representations, Caenwood Estates consider that there is scope for a more extensive residential allocation on its land, should the Inspector consider that additional housing land is required. This is set out in further detail in our Reg.19 representations and we do not expand upon this further here.

1.1.4 Caenwood Estates supports the proposed allocation. Jonathan Buckwell of DHA Planning will attend the Examination to assist the Inspector in relation to this site.

1.1.5 In our Regulation 19 representations, we commented that notwithstanding the support for the policy, and whilst we have no objection to the aims and objectives of criterion 6, we object to the current wording, which lacks clarity and precision. The criterion, as worded, requires:

*"6. Improved access to the wider area, which should be secured as public open space"*

1.1.6 The phrase "the wider area" is vague and open to a number of different interpretations. We suggest the alternative wording below, which would address our objection on this issue:

*6. Improved access to the area shaded green on Map 5, which should be secured as public open space and as a landscape buffer*

## **2 Matter 7: Residential Site Allocations**

### **2.1 Issue 1: Royal Tunbridge Wells and Southborough**

2.1.1 Where relevant, Caenwood Estates respond to the Inspector's questions in relation to site AL/RTW5 as follows.

### **2.2 Q27. How has the proposed area of residential development been established? What is it based on and is it justified?**

2.2.1 Caenwood Estates agrees that the proposed area of residential development is capable of accommodating at least 100 units whilst taking account of the constraints identified within the policy. We are content that this is an appropriate figure for the Local Plan, although further detailed work may present opportunities to increase this figure slightly in due course.

#### ***Joint working***

2.2.2 Caenwood Estates supports the approach proposed in policy STR4 whereby the development proposals for sites that are in multiple ownerships should be accompanied by an appropriate means of masterplanning.

2.2.3 Caenwood Estates confirms that a joined-up approach to planning will be pursued at the AL/RTW 5 Caenwood Farm allocation, where Caenwood Estates represents a larger parcel of land, with a smaller 1.18ha (2.9 acre) parcel controlled by Dandara. The land which Caenwood Estates represents enjoys at least two potential access points onto Speldhurst Road. Both parties have been in discussions for some time in relation to these allocations, and indeed a joint submission was made at the Regulation 18 stage.

### **2.3 Q28. What is the site boundary based on? Is it sufficiently clear to users of the Plan where residential development is expected to be located?**

2.3.1 Caenwood Estates consider that this question is for the Council to answer in full, but we have no objections to the diagram accompanying this policy.

### **2.4 Q29. Is it necessary to widen Speldhurst Road in order to facilitate the proposed development? Is it sufficiently clear to users of the Plan what highway improvement works are required?**

2.4.1 It is not considered necessary to widen Speldhurst Road in order to facilitate the proposed development, with the potential exception of some localised widening around the site access to facilitate turning by larger vehicles (e.g. refuse freighters).

2.4.2 The section of Speldhurst Road in question is residential in character and subject to a 30mph speed limit. Manual for Streets design principles are therefore applicable, where vehicle speeds should be kept to a minimum and priority given to pedestrians and cyclists. Extensive carriageway widening would be contrary to

these principles – and those of the Council's Local Cycling and Walking Infrastructure Plan – and is not required, as the road is already capable of conveying two-way traffic flows, including by buses and service vehicles.

- 2.4.3 The wording of Point 2 of Policy AL/RTW 5 should be amended to clarify that any widening of Speldhurst Road would be limited and localised in nature. Any existing on-street parking capacity displaced by the formation of the site access can be re-provided within the site.

**2.5 Q30. Will it be possible to widen Speldhurst Road and retain trees along the site frontage?**

- 2.5.1 It is not considered that the localised widening of Speldhurst Road would lead to materially greater tree loss than the formation of the site access itself. Due to the low design speed on Speldhurst Road, the required visibility splays can be achieved without extensive tree loss along the wider site frontage. The final access design will be informed by an arboricultural survey to ensure that the impact on any high quality trees in particular is minimised.

**2.6 Q31. Do exceptional circumstances exist to alter the Green Belt boundary in this location, having particular regard to paragraphs 140 – 143 of the Framework?**

- 2.6.1 As set out in our previous representations, Caenwood Estates agrees that exceptional circumstances exist to alter the Green Belt boundary in this location.
- 2.6.2 SLP paragraph 4.45 recognises that the Main Urban Area of Royal Tunbridge Wells and Southborough is a "prime candidate" for meeting housing needs. As with much of the borough, the urban areas are surrounded by land which is in the Green Belt and/or in the High Weald AONB, though land to the west and north in particular (including the wider Caenwood Farm site) falls outside the AONB. With opportunities for development in Tunbridge Wells constrained, the Council needs to make the best use of the least constrained, most sustainable options such as that proposed at AL/RTW5 and indeed additional land at Caenwood Farm.