
Tunbridge Wells Borough Council Tunbridge Wells Local Plan Examination

Hearing Statement

Matter 7 – Residential Site Allocations

Prepared by Barton Willmore LLP on behalf of Obsidian Strategic Asset
Management Limited

May 2022

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1.0 INTRODUCTION

Background

- 1.1 We act on behalf of Obsidian Strategic Asset Management Limited ('our client'). Our client is a key stakeholder and promotor of land at Hubbles Farm and South of Hasting Road, Pembury ('the Site') for residential development, which is included within the Plan at Policy AL/PE2.

Site and Policy Context

- 1.2 The proposed Site allocation under Policy AL/PE2 currently lies immediately outside the 'Limits to Built Development' (LBD) Boundary of Pembury. It falls within the wider Metropolitan Green Belt, wider High Weald AONB and wider Kent Special Landscape Area. However, it is a relatively contained site with the A21 to the south providing a clear and defensible boundary.

2.0 MATTER 7 ISSUE 2: PEMBURY. QUESTIONS REGARDING AL/PE2

Q9. How has the proposed area of residential development been established? What is it based on and is it justified?

- 2.1 Site allocation AL/PE2 adjoins existing residential properties located to the north of the Site along Hastings Road. To the west lies the cricket pitch and Pembury Cemetery (associated with the Upper Church of St Peter to the north). To the south lies the A21 within a landscaped cutting. The allocation presents a logical and contained extension to the settlement.
- 2.2 The feasibility of developing the Site has been investigated and a number of assessments have informed the extent and appropriateness of the residential area. This includes a landscape visual impact assessment prepared by EnPlan; Tree Survey; Archaeological and Heritage Assessment; Ecological Surveys; Flood Risk and Drainage Assessment; Noise Assessment; and Transport Assessment.
- 2.3 The conclusions of this work have shown that the extent of the residential allocation is appropriate and development on the Site can be delivered without significant adverse effects. The Flood Risk Assessment prepared by Glanville, confirms the low flood risk potential of the Site. The Groundwater Source Protection Zone affects only a small proportion to the north of the Site. A drainage strategy can therefore be produced which includes an element of infiltration as well as managed accumulation and discharge.
- 2.4 The Site can also achieve appropriate noise criteria for homes. The noise assessment undertaken by Cole Jarman demonstrates that with mitigation measures such as an acoustic fence within the southern landscaped boundary (to the north of the A21), appropriate internal and external residential noise levels can be achieved.
- 2.5 Finally, sufficient infrastructure capacity has been identified to accommodate the development of the Site and discussions are ongoing to agree an appropriate servicing strategy.

Q10. What is the justification for the proposed Green Belt boundary? Will the revised boundary be clearly defined, as required by paragraph 143 of the Framework?

- 2.6 The Site Allocation will meet the objectives of NPPF paragraph 143 by replacing a weak boundary with a clear and defensible boundary – the A21.
- 2.7 As concluded within the Green Belt Review (GBR) Stage Two (July 2017) and the Strategic Housing and Economic Land Availability Assessment (SHELAA) – Jul 2019 (Site Ref 50), the Site (falling within land parcel PE1), performs 'relatively weakly' in meeting the purposes of the Green Belt. Accordingly, the level of harm resulting from the Sites release from the Green Belt is found to be 'low', and 'the A21 would represent a stronger boundary than the existing settlement edge' in seeking to define boundaries of the Green Belt in stronger and more permanent terms.
- 2.8 The Stage Three 'Assessment of Green Belt Allocations' (November 2020) provided a more focused assessment of emerging allocations against the five Green Belt purposes, which included consideration of the Site (AL/PE2). This assessment concluded similarly that the release of the Site would 'replace an existing weak Green Belt boundary (rear gardens of residential properties) with a strong boundary (the wooded cutting of the A21)'.
- 2.9 Overall, the evidence base demonstrates in a logical and transparent manner why the release of this Site from the Green Belt is a justified decision in seeking to meet identified housing needs while protecting most valuable Green Belt land and reinforcing boundaries, using physical features that are readily recognisable and likely to be permanent.

Q11. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.10 It is clear, in the light of the Council's urban capacity work, that some level of managed Green Belt release is necessary to meet local housing needs in the absence of a neighbouring authority being capable of accommodating this additional requirement.
- 2.1 We are therefore supportive of this approach and the clarity in which TWBC has pursued the sequential requirements of the NPPF in demonstrating that exceptional circumstances exist to support Green Belt release in order to meet local housing needs.

- 2.11 We further support the strategy to release Green Belt land at Pembury. Pembury is the principal settlement in its parish and is located approximately 3.4 miles from Royal Tunbridge Wells to the south west, which is a Primary Regional Town Centre (Policy ED8). As such, Pembury is well positioned to accommodate housing growth for the Borough, in accordance with the Development Strategy outlined at Policy STR1, having regard to its role and function, constraints, and opportunities.
- 2.12 The Council's spatial development strategy for additional housing in Pembury is therefore supported and will provide additional housing in close proximity to services, jobs and community facilities. The requirement to provide affordable housing (identified within the wording of policy AL/PE2) offers a significant opportunity to meet the needs of the local community, including key workers, such as hospital and/or emergency service staff.

Q12. What is the justification for the inclusion of an area of safeguarded land? Is an extension to the cemetery needed and how and when will it be provided?

- 2.13 It is unclear at this stage how much land will be needed for the extension of the cemetery but discussions with the Parish Council is ongoing.
- 2.14 The Landscape Visual Impact Assessment produced to inform the development of the Site supports the use of this area for open space or cemetery extension. There has also been interest by the Cricket club to extend their facility in this location. We would therefore support a broader designation of this area for cemetery extension and open space/recreation (rather than solely 'safeguarded land'). This would allow flexibility of use, depending on the Parish Council requirement and development aspirations.
- 2.15 It is envisaged that the land would be developed for open space or provided as land for a cemetery extension through a S106 Agreement as part of any planning permission.

Q13. Does site allocation AL/PE2 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?

2.16 The extensive Green Belt studies which informed the consideration of the Site Allocation proposals, included consideration of the impact on the designated AONB.

2.17 This exercise is reflected within the SHELAA (January 2021), which concluded that: *'The site is sustainably located and would result in only low harm if released from the Green Belt. The scale of development is considered appropriate for its location in the AONB'.*

2.18 The basis for this finding was that the Site: *'..lies partly within/mostly adjacent to the settlement edge, and as such is considered sustainable in that context. The site in conjunction with other sites, lies between the existing settlement and the A21 embankment, and allocation would represent a modest infilling, appropriate in this AONB landscape. Furthermore, these parcels are not well connected with other agricultural land. This combined with low harm if released from the Green Belt means the site is a suitable site'.*

2.19 Our own Landscape and Visual Assessment work also supports the conclusions of the supporting evidence. It notes:

'The overall effect on the character and appearance of the landscape and the AONB would be a balance of a limited visual effects on a few views from within the AONB and no change to the key characteristics of the landscape of the AONB. Overall, a slight adverse magnitude of effect on a site of moderate sensitivity. This would represent an effect that would be of a moderate-minor significance but not significant in the meaning of significance as expressed in the EIA Regulations. Furthermore, it is considered that together the development proposals may conserve the designated landscape overall with good design and appropriate mitigation.'

2.20 All existing trees and hedgerows on the Site are identified to be retained with further enhanced planting along the southern boundary. The proposals therefore provide an opportunity to contribute to the landscape character of the area and allow enhanced public access.

Q14. Where will the main access to the site be taken from?

- 2.21 A 'single point of access' junction on Hastings Road is proposed. The acceptability of this single access point arrangement has been confirmed in pre-application discussions with KCC, and further pre-app discussions are currently being undertaken to agree the detail of the design.

Q15. Is it clear to decision-makers, developers and local communities how applications for planning permission should 'consider' improvements to the cycle and bridleway network? What is required of development proposals?

- 2.22 Yes, the design and layout of the scheme has explored a segregated east-west cycle route, connecting with the adjacent site allocation Policies AL/PE 1 and AL/PE 3 as well as improvements to the existing cycle way network, including the A264 Pembury Road cycle route into Royal Tunbridge Wells town centre.
- 2.23 The Policy requirement to contribute towards upgrading the cycle path along Chalket Lane (WT240) and the link to the east side of Royal Tunbridge Wells at Hawkenbury is also supported and a Position Statement has been signed showing commitment to these improvements.