

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 7: Residential Site
Allocations**
**Issue 11: Frittenden (Policy
PSTR/FR1)**

Document Reference: TWLP/046



Contents

AL/FR1 – Land at Cranbrook Road, Frittenden	3
Inspector’s Question 1: [re. effect on character and appearance of the area]	3
TWBC response to Question 1	3
Summary and Conclusion.....	9

Matter 7 – Residential Site Allocations

Issue 11 – Frittenden (Policy PSTR/FR1)

AL/FR1 – Land at Cranbrook Road, Frittenden

Inspector’s Question 1: [re. effect on character and appearance of the area]

What effect will the proposed allocation have on the character and appearance of the area, having particular regard to the existing linear pattern of development in the village?

TWBC response to Question 1

Introduction

1. The impact on the character and appearance of the area has been considered as part of the plan-making process, which has included consideration of the linear pattern of existing development in the village. The Council’s response that follows sets out how the allocation has taken this into account in policy wording, including areas set aside for development, open space, and landscape buffers. This is followed by an explanation of how a recent development proposal for the site (planning reference 21/01638) has also taken the character and appearance of the area, including the existing linear pattern of development, into account. The response explains the implications of the proposal, 21/01638 on the site capacity requirements of the allocation policy AL/FR1, which is followed by a summary and conclusion on the effect the proposed allocation will have on the character and appearance of the area.

Proposed policy wording and area set aside for development

2. The character and appearance of the area, including the linear pattern of existing development in the village, has been a factor in decisions made about allocating the site and in the policy requirements.

3. This is reflected in the area of the site indicated for residential development and areas indicated for open space and landscape buffer. These areas are shown on the indicative Map 57, Site Layout Plan shown on page 244 of the Submission Local Plan [CD 3.128]. Of note is the indicated open space and landscape buffer shown adjacent to Cranbrook Road, along the site frontage. The need to ensure development in keeping with the context of the site, including Frittenden Village, has also been a factor in decisions made about the site capacity.
4. Criterion 4 of the site allocation policy requires that the layout and design of the scheme gives full consideration to the site's edge-of-village location, providing a suitable and sensitive urban edge to the settlement, including provision of landscape buffers and open space to ensure a soft approach to the village and be sensitively designed in relation to heritage assets (which includes the Frittenden Conservation Area and Parsonage Farm, a Post-Medieval Historic Farmstead to the north east of the site).
5. Figure 1 below shows the area marked for residential use (in orange) and areas shown for open space and landscape buffers (in green) relative to the existing development in the village, in particular development north east of the site. Parsonage Farm is indicated by the pink dot.



Figure 1 – Site Allocation AL/FR1 showing residential use (orange) and open space/landscape buffers (green).

Planning history

6. There has been a recent planning application for the entire site, submitted under planning reference 21/01638. This sought planning consent for the erection of 23 dwellings, two units below the lower end of the range set out in the allocation policy wording.
7. The application was presented to the Council's Planning Committee (on 16 March 2022) where committee resolved to grant planning permission, subject to completion of a Section 106 legal agreement to secure nine units of affordable housing provision and a range of financial contributions. It is noted that the nine affordable units equates to a contribution of 39.1%, just below the 40% affordable housing sought by the site allocation AL/FR1. It is noted that the contribution is policy compliant against the existing Development Plan, which seeks 35% affordable housing provision.
8. The associated [committee report](#) makes various references to impact of the development proposal on the character and appearance of the area and sets out the requirements of the site allocation policy included in the Submission Local Plan (and notes that limited weight can be afforded to this, at that time). Figure two below shows the illustrative masterplan for the site (drawing PO2 revision D), showing the set back of properties fronting Cranbrook Road and their siting in line with properties to the east, with looser development behind, reflecting the historic farmstead pattern of development to the north east at Parsonage Farm.



Figure 2 - Illustrative masterplan for the site (planning reference 21/01638)

9. Pertinent points in the committee report include paragraph 10.10 (which is part of the report that talks about the emerging Local Plan policies for Frittenden, which the report acknowledges merit limited weight at that time) explains that *“It is noted by specialist officers that the site is a challenge to develop in terms of settlement pattern as the site is deeper than existing development. However, the proposed scheme is considered a good response to development patterns, density and position is not characteristic of the historic or more recent development, due to the inherent nature of the site, being edge of a small rural village and being a deeper plot. Care has been taken within the layout and appearance of the development. Architectural style is also based on local context. A buffer has been retained around the site and some areas of public open space retained.”*

10. Paragraph 10.11 of the same report advises *“The design, layout and quantum of development is considered to have addressed the main requirements of this policy in terms of the type of development, patterns of development and layout, appearance and architectural style, indication of materials and use of landscaping and landscape buffers, the scheme is considered to relate to context as much as it is able, when taking into account its position, depth of the site and the density of development.”*

11. Paragraph 24 addresses the layout, design, and visual amenity of the proposal, while paragraph 10.25 deals with site layout.
12. Paragraph 24 states “.....*the application site is located at the edge of a rural settlement and therefore has been designed to respect the context of the site and surrounding area. Two small areas of land have been left as public open space, to the centre of the site and to the south west (that also serves as a SUDs feature). Furthermore, the scheme has been designed with a significant set back from the Cranbrook Road, that would accommodate both the existing hedgerow, parking and would see the front row of dwellings set back some 21 m from the road and set back behind the existing building line to the east.....*” and “*Whilst the SLP sought a higher density, it is considered that the proposal as submitted, seeks to achieve suitable dwelling numbers whilst respecting the rural, edge of village location...*”
13. Paragraph 25 picks up on the challenge to develop the site, stating that “...*Whilst the site is a challenge to develop, due to its site depth, the focus is on a stronger, linear development to the front of the site, including terrace dwelling that follow the existing building line to the east. The development to the rear would be looser and the reduced ridge heights would assist in highlighting the design approach fronting onto Cranbrook Road*”.
14. Paragraph 29 identifies that the Council’s specialist landscape and conservation officers consider the layout suitable and that this does try, with some success, to respond to local context with the arrangement and form of buildings.
15. It is worth noting that paragraph 10.34, addressing the matter of design, notes that the scheme has been designed to ensure local distinctiveness.
16. The Conservation and Urban Design Officer comments “*care has been taken with the layout (ribbon at the front, loose form to the rear such as a historic farmstead would appear) and appearance*”. It is further noted that the architectural style is based on context and materials appropriate to the house typology (paragraph 10.36).
17. Paragraph 10.37 notes that “*Overall, the layout and design is considered appropriate, locally distinctive and reflective of the context of the surrounding landscape character*”.

18. The committee report address impact on heritage assets, and it is worth noting that paragraph 10.40 sets out that “*The contribution of the site is considered to be relatively minor, just as part of the approach with no historic connections*”. Furthermore, “*The CO concludes that the harm would be at the low end of less than substantial harm “thanks to the work put into the design process to mitigate any harm and respond to context as far as possible given the numbers on the site and location.”* (The CO is the Conservation Officer).
19. Paragraph 10.41 identifies that the proposal would preserve the character and appearance of the conservation area.

Implications of the development proposal (reference 21/01638) on the site capacity requirements

20. The Council has re-considered the site capacity in light of the recent resolution to grant the proposal submitted under planning reference 21/01638. The proposal is for 23 dwellings and the current policy as set out in the Submission Local Plan provides for a range of 25 – 30 dwellings.
21. Given the recognised challenge in achieving a suitable site layout for the site as set out in paragraphs 9 and 13 of this hearing statement, which adequately addresses the need to protect the character and appearance of the area, including having regard to the linear pattern of development in the village, it is considered a site capacity of approximately 23 dwellings is more realistic. To achieve a development in line within the current policy range of 25 – 30 dwellings, it is likely that the looser development to the rear of dwellings fronting Cranbrook Road, would need to be lost to the sites detriment. There would also be consequential knock-on effects such as the need for further on-site parking provision.
22. Accordingly, the Council consider it appropriate to reduce the site capacity in line with the recently determined planning proposal, i.e., to ‘approximately 23 dwellings’. This would allow some flexibility should an alternative proposal for the site come forward in the future. The modified text of the policy would read as follows (deleted text is shown ~~struck through~~, additional text is shown underlined):

Policy AL/FR 1

Land at Cranbrook Road, Frittenden

This site, as defined on the Frittenden Policies Map, is allocated for residential development providing approximately 25-30 23 dwellings, of which 40 percent shall be affordable housing.....

23. The supporting text to the policy, at paragraph 5.531 would need amending to reflect this change to the site capacity. This change would be: “..... it is anticipated that some ~~25-30~~ 23 dwellings will.....”
24. Also, as a consequence of this change, the strategic policy for Frittenden Parish, policy STR/FR1 (set out on page 242 of the Submission Local Plan) would need amendment as follows (deleted text is shown ~~struck through~~, additional text is shown underlined):

Policy **PSTR/FR 1**

The Strategy for Frittenden parish

The development strategy for Frittenden parish is to:

1. Set Limits to Built Development for Frittenden village, as defined on the Policies Map(Inset Map 24) as a framework for new development over the plan period, incorporating the site allocation Policy AL/FR 1;
2. Deliver approximately ~~25-30~~ 23 new dwellings (of which 40 percent are to be affordable dwellings) on the site allocated as Policy AL/FR 1) in this Local Plan in the plan period;.....

Summary and Conclusion

25. The above response demonstrates that the Council has considered the impact of developing this site on the character and appearance of the area in deciding to allocate this site, and in policy wording itself. This is reflected by the proposed site capacity, which the Council considers should be amended following detailed consideration of a recent planning application (reference 21/01638) for 23 dwellings, which benefits from a resolution by the Council’s Planning Committee to grant subject to completion of a legal agreement.
26. The Council considers a modification to the policy requirement to reduce the site capacity to ‘approximately 23 dwellings’ from the current range of 25 – 30 dwellings necessary, for the reasons set out at paragraph 21 above. This would require a consequential amendment to the overarching strategic policy for Frittenden Parish set out under policy STR/FR1, set out at paragraph 24 above.

27. Consideration of the impact on the character and appearance of the area is also demonstrated by the area and extent of the site indicated for residential development and open space and landscape buffer.
28. This is supported by the resolution to grant planning permission for the proposal (reference 21/01638) that is generally policy compliant with the proposed site allocation Policy AL/FR1.