



Tunbridge Wells Borough Council

Strategic Housing and Economic Land Availability Assessment - Addendum

October 2021

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Introduction

1. This Addendum to the [Strategic Housing and Economic Land Availability Assessment for Pre-Submission Local Plan, January 2021](#) (SHELAA) has been prepared to support the submission version of the new Tunbridge Wells Borough Local Plan.
2. The Council consulted on a Regulation 19 Pre-Submission version of the Local Plan between 26 March and 4 June 2021. Through the consultation a small number of representations promoted new sites for allocation in the Local Plan that had not previously been submitted to the Council for assessment through the SHELAA process or at previous consultation stages.
3. Other representations have further promoted sites already assessed through the SHELAA, January 2021, the findings of which indicate such sites as being unsuitable as potential allocations in the Local Plan. Some of these representations have commented on existing SHELAA assessments, for example if a promotor has considered an existing assessment to have omitted an important piece of descriptive information, where a promotor has disagreed with the Sustainability Appraisal commentary stated on the SHELAA assessment sheet or has considered that the assessment is inaccurate in some way (such as in terms of Green Belt assessment or site yield).

Purpose

4. The purpose of this Addendum is to:
 - i. present SHELAA site assessments for new sites promoted through the Regulation 19 consultation that were not previously assessed through the SHELAA process (or at previous consultation stages);
 - ii. explain how the Council has responded to comments about existing SHELAA assessments (dated January 2021) received through the Regulation 19 public consultation on the Pre-Submission Local Plan. This includes such comments relating to omission sites previously assessed through the SHELAA, January 2021.

New sites promoted through the Regulation 19 consultation

5. This addendum includes the site assessments for new sites promoted through the Regulation 19 consultation on the Pre-Submission Local Plan, which had not previously been submitted to the Council for assessment. There are seven sites in total covering the parishes of Brenchley & Matfield, Frittenden, Horsmonden, Pembury as well as the larger settlements of Royal Tunbridge Wells and Paddock Wood. A further site in Capel parish has been submitted for consideration as a biodiversity net gain site – this does not require assessment through the SHELAA process which focuses on housing and employment land.

6. The site assessment process for these sites has followed the same assessment process set out in the [Main Report](#) forming part of the SHELAA, January 2021. As with the earlier SHELAA site assessments, the site assessments and outcomes have informed the site allocations contained in the Local Plan (along with the wider evidence base), in this instance the Submission Local Plan.

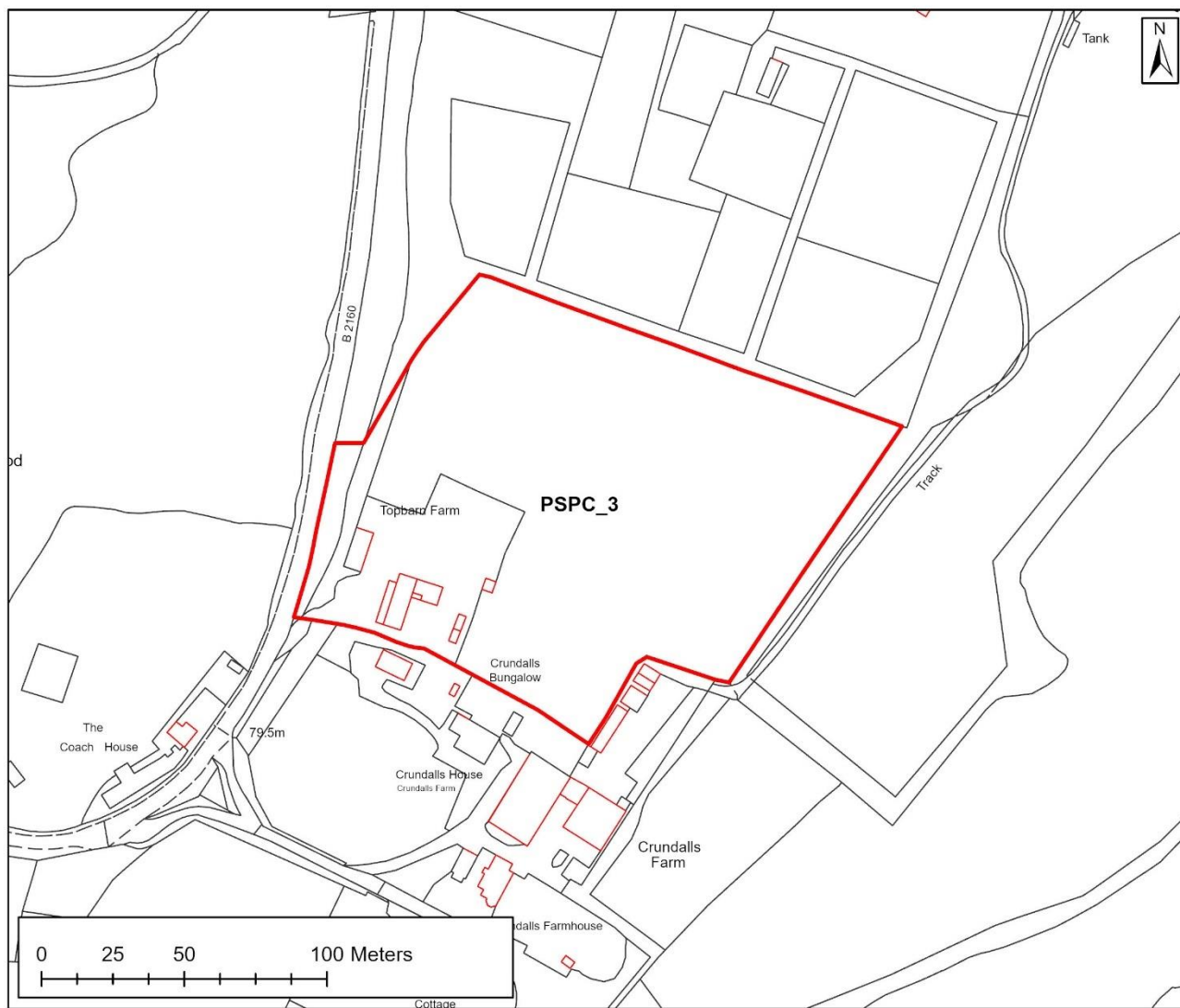
Representations on existing SHELAA assessments

7. The Council has considered all representations submitted to the Regulation 19 consultation, including those comments made within representations relating to omission sites (previously assessed through the SHELAA, January 2021). The Council's initial response to such representations is given in the summary of main issues, under the relevant place-shaping chapter of the Pre-Submission Local Plan, forming part of the Submission Consultation Statement. Planning Officers have made a judgement on whether comments received (including any submitted supporting documents) materially affect the existing SHELAA assessment for the site, for example if a red line differs to that shown on the existing SHELAA assessment sheet or whether other matters commented upon such as Green Belt matters, trees, supporting technical information materially affect the assessment previously undertaken.
8. A number of omission sites (circa 45 in total), assessed through the SHELAA process previously, were further promoted through the Regulation 19 consultation. The Council's initial response to these is also picked up in the summary of main issues relating to the place-shaping element of the Pre-Submission Local Plan.

Brenchley and Matfield

Site Reference: PSPC_3

Site Address: Matfield MOT Centre and land to rear, Gedges Hill, Matfield, Tonbridge, TN12 7EA



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Map Dated: July 2021

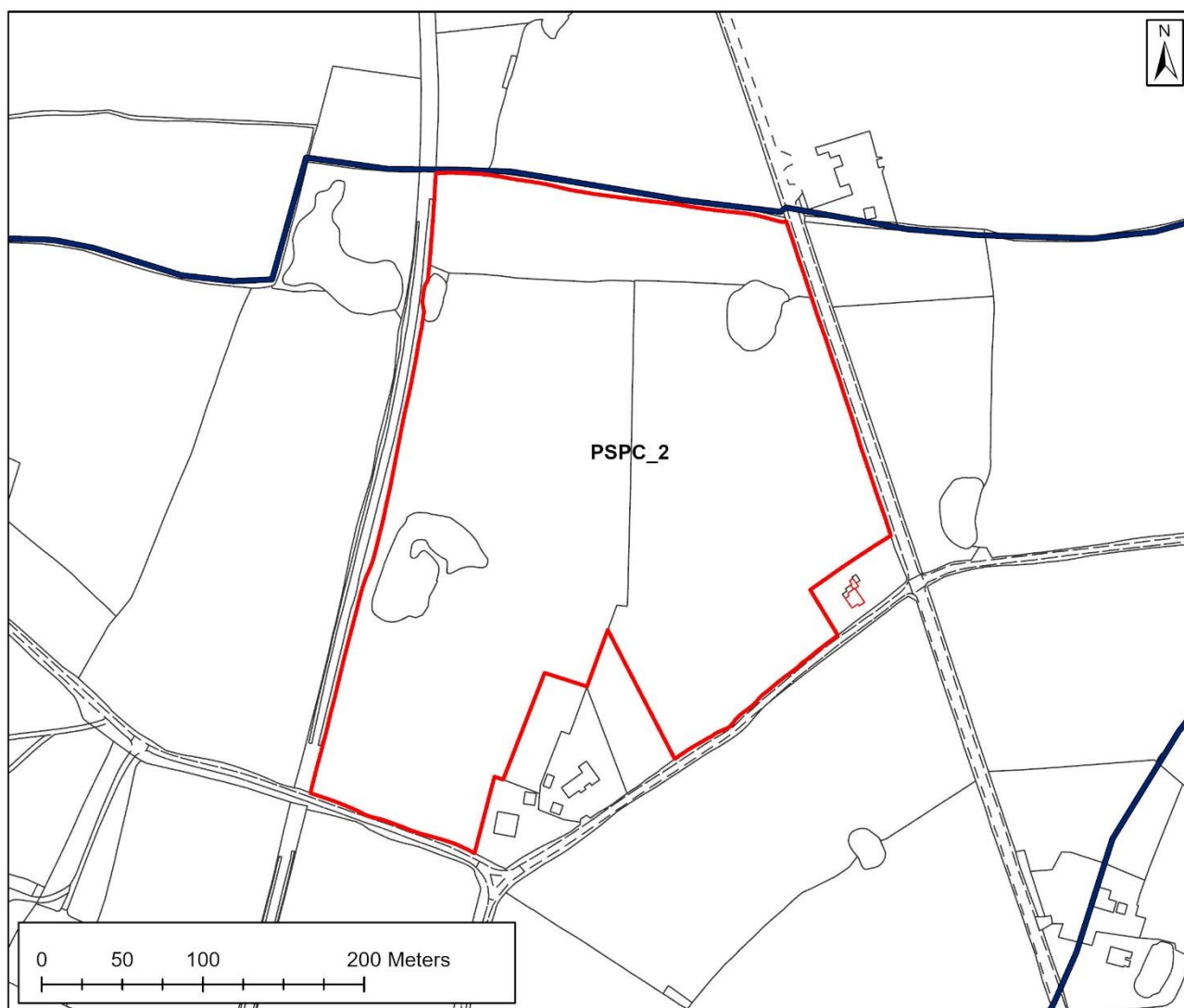
Parish:	Brenchley and Matfield.
Settlement:	Remote from settlement centre.
Gross area (ha):	2.01
Developable area (ha):	1.93
Site type:	Mostly greenfield site used for agriculture, together with an area of commercial use.
Potential site use:	Site has been assessed for development potential, notably for residential use, as well as retention and possible expansion of commercial uses.

Potential yield if residential:	58
Issues to consider:	<p>Ecology: Adjacent to Ancient Woodland; Transport Infrastructure: PROW; HLC Period: Late 20th Century, Boundary Lost 0-25%; APA: Some Palaeolithic potential; General background archaeological potential; LCA: Fruit Belt; ALC: GRADE 3.</p>
Site Description:	<p>This is a mostly greenfield site with some existing commercial use (Matfield MOT Centre). Adjoining uses include residential (limited), fields and farm buildings, and commercial enterprises. The site boundaries include an evergreen hedge, trees and fencing.</p> <p>There is an existing vehicular access from the main road B2160. There is no obvious pedestrian route apart from utilising the vehicular access route although it may be possible to also use PRoW WT272 that runs diagonally across the site and connects to the main road.</p> <p>The main road adjacent to the site (to the west) is a busy road with 60 mph national speed limit; it lacks pavements and lighting and is at some distance from the services provided either by Matfield to the south or Paddock Wood to the north.</p>
Suitability:	This site is unsuitable for residential use given that it is remote from a settlement centre and would not be sustainable in that context. There is existing economic development on the site. It is considered that this site could come forward as an economic windfall site.
Availability:	<p>Available</p> <p>Single ownership</p>
Achievability:	N/A
Sustainability Assessment:	The site is not a reasonable alternative.
Conclusion:	This site is considered unsuitable as a potential site allocation.
Reason:	The site could come forward as an economic windfall site. The site is not well related to a settlement centre and therefore any residential use of the site would be unsustainable in this context.

Frittenden

Site Reference: PSPC_2

Site Address: Land Surrounding Shenlands Barn, Ayleswade Lane, TN27 9JG



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Map Dated: September 2021

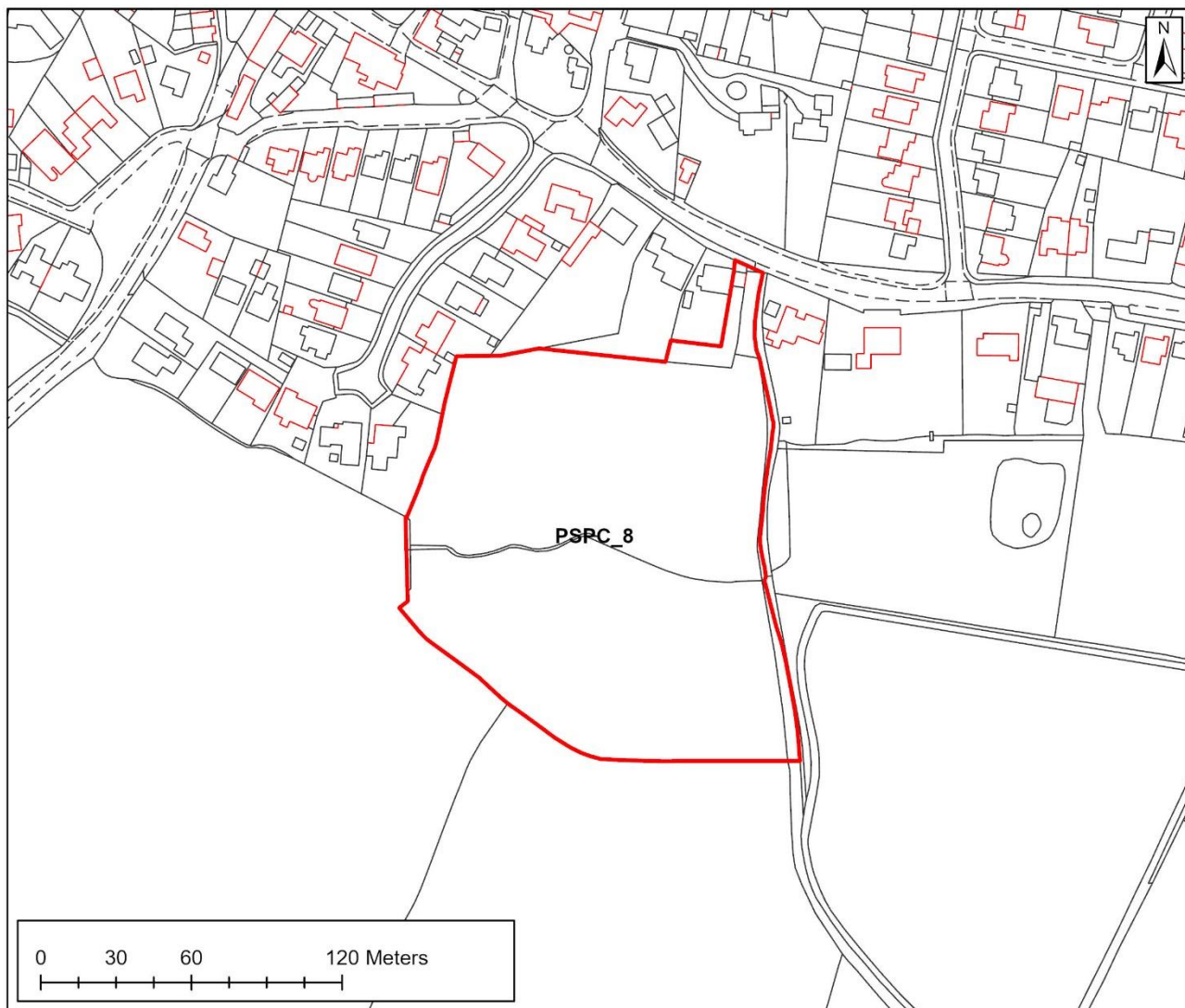
Parish:	Frittenden.
Settlement:	Remote from a settlement centre.
Gross area (ha):	9.40
Developable area (ha):	7.96
Site type:	Greenfield site remote from a settlement.
Potential site use:	Site has been assessed for development potential, notably for residential use.
Potential yield if residential:	239
Issues to consider:	Ecology: River Beult SSSI Impact Zone; Environment Agency Flood Zone 2;

	<p>Environment Agency Flood Zone 3; HLC Period: Early post-medieval, Late post-medieval, Boundary Lost 26-50%; APA: Some Palaeolithic potential; General background archaeological potential; LCA: Low Weald Farmland; ALC: GRADE 3; Heritage: in proximity of Historic Farmstead.</p>
Site Description:	<p>Site lies north of Ayleswade Lane, abutting the borough boundary to the north and west of the A274 Biddenden Road. Ayleswade Lane is a narrow rural lane, with drainage ditches along parts of its length. A dismantled railway line runs adjacent to the western boundary of the site. The site is a greenfield site that lies adjacent to and wraps around an existing residential dwelling and curtilage (Shenlands Barn) located towards the southern boundary adjacent to Ayleswade Lane. There are two ponds on the site and others in proximity. There are three residential dwellings adjoining the site, with fields in the wider landscape and some residential uses.</p> <p>The site is largely bounded by trees, particularly to the west and along the southern boundary, with hedgerows as well. The topography of the site is generally flat, with the wider landscape being one that rises to the south. There is a metal field gate serving the site off Ayleswade Lane and two further points of access from the A274 Biddenden Road. The site is close to Public Right of Way WC271 and wider Public Right of Way network.</p>
Suitability:	<p>Unsuitable: The location of this site has the benefit of being outside of key constraints, notably the Green Belt as well as the High Weald AONB and is not distant from Headcorn which provides a mainline rail link to London. However, the site has a rural context, and it is considered occupants of the site would be car dependent, which would not be sustainable in this context.</p>
Availability:	<p>Available Single ownership</p>
Achievability:	<p>N/A</p>
Sustainability Assessment:	<p>Site is not a reasonable alternative.</p>
Conclusion:	<p>This site is considered unsuitable as a potential site allocation</p>
Reason:	<p>The rural context of the site, and its location not well related to a settlement centre means that the site not a sustainable site suitable for residential use.</p>

Horsmonden

Site Reference: PSPC_8 (includes SHELAA site submission 355)

Site Address: Land South of Goudhurst Road, Horsmonden



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Map Dated: October 2021

Parish:	Horsmonden.
Settlement:	Horsmonden.
Gross area (ha):	2.15
Developable area (ha):	2.15
Site type:	Greenfield site part within/mostly adjacent to LBD.
Potential site use:	Site has been assessed for development potential, notably for residential use.
Potential yield if residential:	65
Issues to consider:	Adjacent to/partly within LBD;

	<p>HLC Period: Early Modern, Medieval, Assart Fields, Boundary Lost 0-25%, Boundary Lost 26-50%;</p> <p>APA: Some Palaeolithic potential; General background archaeological potential;</p> <p>LCA: Fruit Belt;</p> <p>ALC: GRADE 2, GRADE 3;</p> <p>Heritage: Part within/mostly adjacent to Conservation Area, adjacent to listed building and in proximity to Hop Picker's Railway Line;</p> <p>Transport Infrastructure: PRoW WT345 runs through the eastern side of the site.</p>
Site Description:	<p>Site is currently an overgrown field largely covered by brambles and includes a pocket of trees as well as a watercourse running west-east through approx. the centre of the site. There are no existing buildings on site. Adjoining uses include residential properties and fields. Public Right of Way WT345 runs along the eastern edge of the site. Boundaries include overgrown brambles, wire fencing, and trees. Vehicle access is unclear, with a small part of the site along its northern edge adjoining Goudhurst Road. There is pedestrian access along the Public Right of Way. There are some differences in level, with topography sloping gently south to the watercourse, then sloping gently to the north. There are public views of the site from the Public Right of Way. The site is quite enclosed, largely due to the overgrown nature of the site and trees along boundaries. There are views out to open countryside southwards.</p>
Suitability:	<p>Unsuitable: It is considered unlikely that an appropriate means of access can be achieved to serve the site. There are also concerns about impact on heritage and on the landscape. The option of providing access from Goudhurst Road is considered to have a detrimental effect on the Conservation Area (through the urbanising effect resulting from provision of the access and footway). The demolition of a garage to provide access, would not outweigh the harm. Development of the site would also adversely affect the setting of the Conservation Area, including when viewed from the PRoW. It would also be detrimental generally to the historic landscape and the setting of the settlement.</p>
Availability:	<p>Available</p> <p>Single ownership</p>
Achievability:	<p>N/A</p>
Sustainability Assessment:	<p>A reasonable site let down by a lack of key services and facilities and public transport options as well as the loss of a greenfield site in an historic landscape. The negative heritage score reflects impact upon the setting of the Conservation Area.</p>
Conclusion:	<p>This site is considered unsuitable as a potential site allocation.</p>
Reason:	<p>It is considered unlikely that an appropriate means of access can be achieved to serve the site and there are concerns about impact of development of the site on the Conservation Area and its setting as well as on the historic landscape and setting of the settlement.</p>

Paddock Wood

Site Reference: PSPC_7

Site Address: The Brackens, Queen Street, Paddock Wood



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Map Dated: July 2021

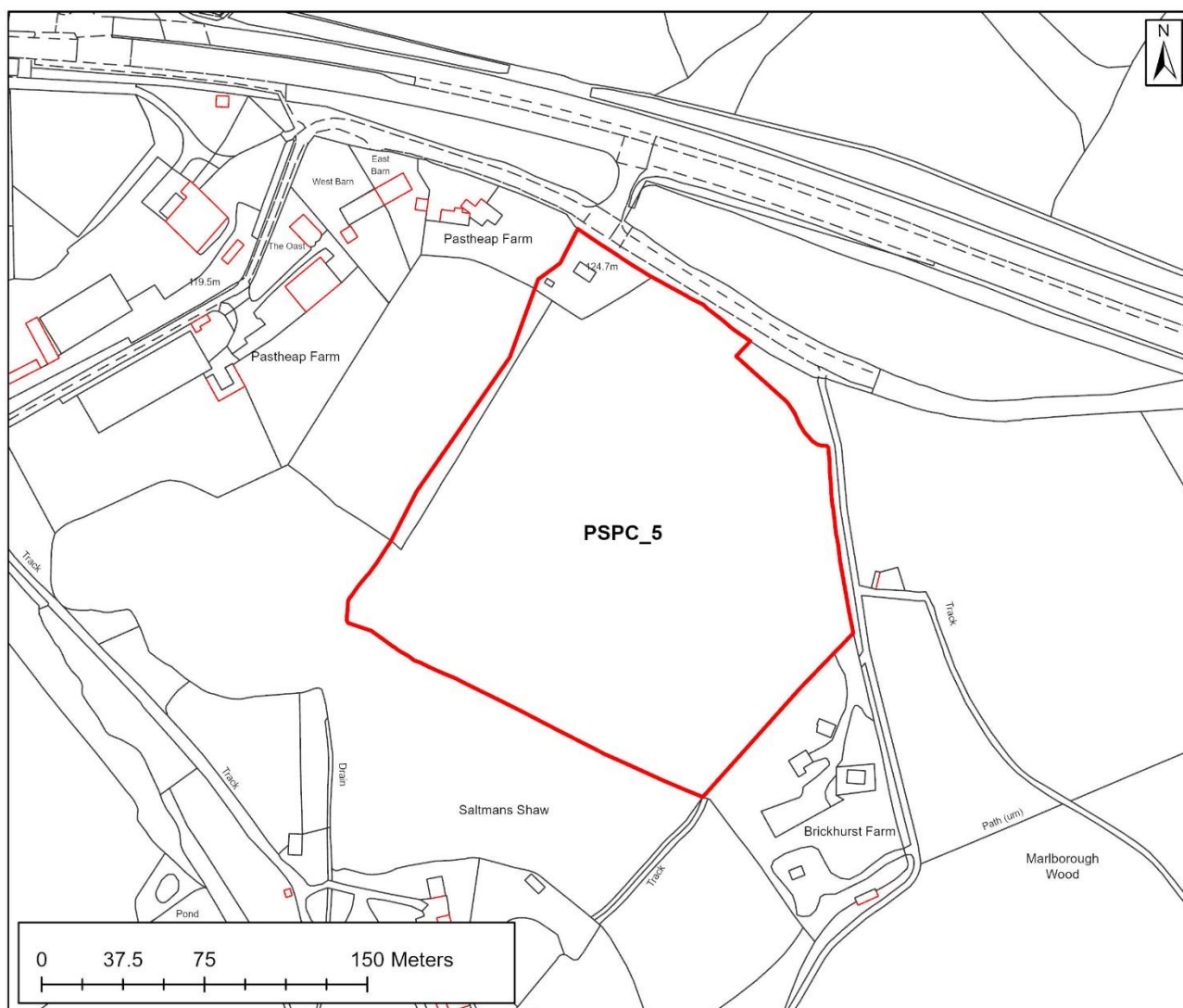
Parish:	Paddock Wood.
Settlement:	Paddock Wood.
Gross area (ha):	0.64
Developable area (ha):	0.64
Site type:	Brownfield Site.
Potential site use:	Residential.
Potential yield if residential:	19
Issues to consider:	HLC Period: Early Modern; APA: Some Palaeolithic potential; General background archaeological potential; LCA: Low Weald Farmland; ALC: GRADE 3

	Outline planning permission was granted on appeal for the provision of three detached dwellings on the open field to the west (LPA Ref. 19/00353/OUT). As of 1 April 2020, this permission remains extant.
Site Description:	The site lies along the north side of Queen Street. It includes two residential properties (The Brackens and Ledgers Bungalow), with an outbuilding to the north. To the west of The Brackens is open in nature and relatively flat and grass surfaced, with boundary fencing to the front of the site, and planting to the west and rear. To the immediate west of the site lies a Public Right of Way (WT256) which runs in a north-south direction. Beyond this path and to the north of the site, and to the south, lies agricultural land.
Suitability:	This site, subject to availability, could be considered suitable for allocation in conjunction with other sites, for a strategic extension to the settlement. This will overcome the relative remoteness of the site from the existing settlement.
Availability:	The site has been submitted by the landowner of The Bracken. However, a land registry search has identified that the eastern portion of the site is under a separate ownership. The availability of the whole site is therefore unknown.
Achievability:	Availability of the whole site is uncertain and therefore it is not known whether the whole site could be delivered during the Local Plan period.
Sustainability Assessment:	This site has a range of positive and negative scores that are mostly minor to reflect its relatively small size. The remote location of the site causes the air, travel, services and equality objectives to score more poorly than those sites adjoining or within the settlement.
Conclusion:	This site is considered unsuitable as a potential site allocation.
Reason:	In conjunction with other sites, this site may contribute to strategic development of the wider area of a site allocation. However, the availability of the whole site is uncertain given that it is in multiple ownership and has been promoted by only one owner. It is therefore not appropriate to include it as an allocation. However, this is a small site and depending on the determination of the final Limits to Built Development (which are currently provisional), it may be considered appropriate to include the site within the Limits to Built Development when finalised.

Pembury

Site Reference: PSPC_5

Site Address: Saltmans Meadows, South of the A21 Between Pastheap Farm and the Kipping's Cross Roundabout



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Map Dated: July 2021

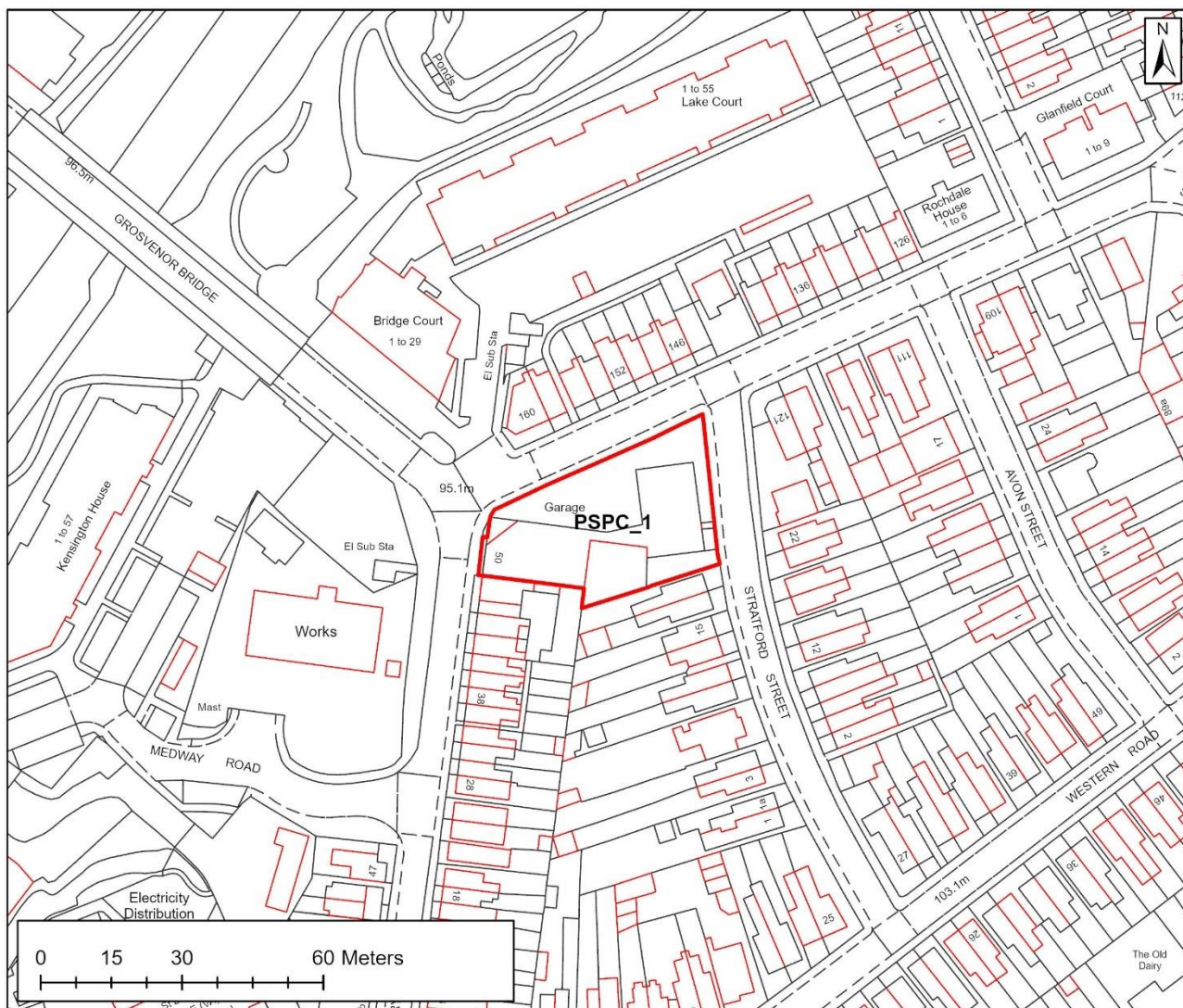
Parish:	Pembury.
Settlement:	Remote from a settlement centre.
Gross area (ha):	3.57
Developable area (ha):	2.73
Site type:	Greenfield site adjacent to A21.
Potential site use:	Site has been assessed for development potential, notably for residential use or economic use.
Potential yield if residential:	82
Issues to consider:	Ecology: Adjacent to Ancient Woodland, Adjacent to LWS, Adjacent to TPOs;

	MGB; AONB; AONB Component Part: Historic Field Boundaries; Heritage: adjacent to listed building/in close proximity of Historic Farmstead; HLC Period: Early Post-Medieval, Boundary Lost 0-25%; APA: Some Palaeolithic potential; General background archaeological potential; LCA: Wooded Farmland; ALC: GRADE 3 Potential road noise from A21.
Site Description:	Site lies south of the A21, adjacent to the historic route of the A21. It is a greenfield site with a small goat shed located in the north west corner of the site. Pastheap Farm adjoins to the west and Brickhurst Farm to the south east, with fields in the wider landscape and limited sporadic residential uses. An area of Ancient Woodland, Saltmans Shaw lies immediately to the south. The site is bounded by trees to the south and east as well as the northern boundary (largely protected by Tree Preservation Orders). A post and wire fence marks most of the western boundary. The site slopes southwards, with long distance views across the landscape to the south. Vehicular access to the site is from an access road off the A21 and through a gate located along the northern boundary of the site. Public Right of Way WT236 is next to the site.
Suitability:	Unsuitable: The site is remote from/not well related to a settlement centre and is not sustainable in this context for residential use. Development would have an adverse impact upon the landscape character, located within the AONB. Furthermore, the site forms part of a Green Belt parcel, the release of which would result in high harm. In economic respects, it is considered that there are other more appropriate sites that can meet the economic growth needs of the borough.
Availability:	Available Single ownership
Achievability:	N/A
Sustainability Assessment:	Site is not a reasonable alternative.
Conclusion:	This site is considered unsuitable as a potential site allocation
Reason:	The site is remote from / not well related to a settlement centre and is unsustainable in this context for residential use. There is also concern about the harm arising should the site be released from the Green Belt as well as landscape impact on the AONB. In terms of economic use of the site, there are other more appropriate sites that can meet the economic growth needs of the borough.

Royal Tunbridge Wells

Site Reference: PSPC_1

Site Address: 123-125 St James' Road, Tunbridge Wells, TN1 2HG



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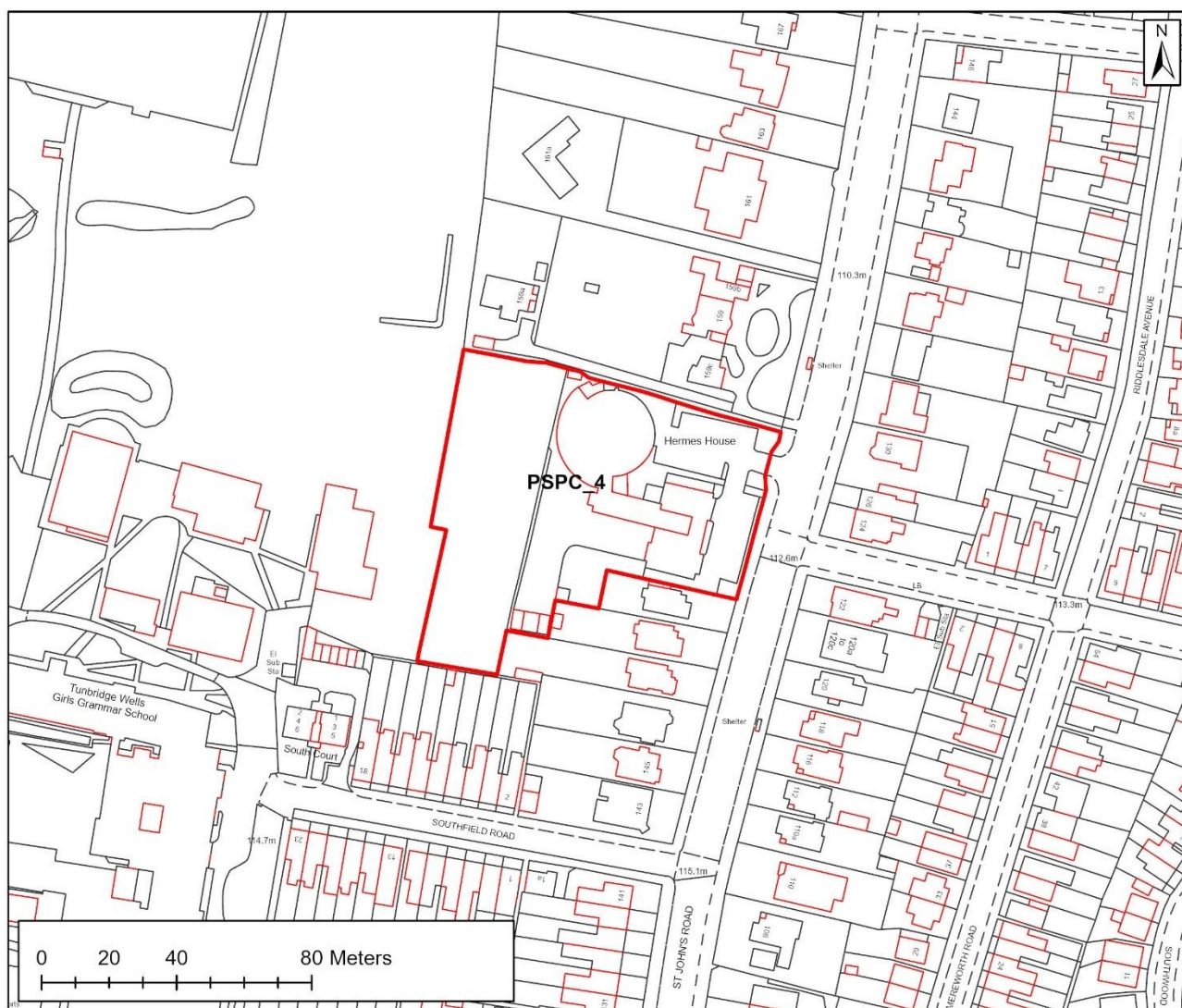
Map Dated: July 2021

Parish:	Royal Tunbridge Wells.
Settlement:	Royal Tunbridge Wells.
Gross area (ha):	0.12
Developable area (ha):	0.12
Site type:	PDL site within LBD of RTW.
Potential site use:	Site has been assessed for development potential, notably for residential use or for a residential and commercial mix.
Potential yield if residential:	20-25 residential dwellings with possible mix of commercial at ground floor and residential above.
Issues to consider:	Within St Barnabas Neighbourhood Centre (2006 Local Plan Designation CR13);

	<p>Within LBD; APA: Some Palaeolithic potential; General background archaeological potential; LCA: Urban; ALC: URBAN; Potential Land Contamination.</p>
Site Description:	<p>The Site is located on the eastern corner of the Junction of St James' Road, Quarry Road and Grosvenor Bridge, located to the north of Royal Tunbridge Wells Town Centre. It is located within the LBD of Royal Tunbridge Wells. The Site is bounded by St James' Road to the north, Stratford Street to the east, a residential property on Stratford Street and commercial units on Quarry Road to the south and Quarry Road to the west.</p> <p>The Site's existing use is a car showroom/dealership (Sui Generis). The site is currently occupied by a mixture of single and double storey buildings with a forecourt fronting St James' Road and parking spaces on the roof of the building accessed via Stratford Street.</p> <p>The surrounding area is predominantly 2-3 storey residential properties on the eastern side of St James' Road and Quarry Road and more modern 6 storey apartment blocks on the western side with a residential development currently under construction on land opposite the site.</p>
Suitability:	<p>This is considered to be a sustainable site in that it is a PDL site that falls inside the LBD of RTW. It is well located for access to local services and facilities close to the town centre. However, it is a valued existing economic use worthy of retention. It is noted that this does not necessarily preclude future redevelopment if the tests in Policy ED 2 are met in the future.</p>
Availability:	<p>Available. Single ownership.</p>
Achievability:	<p>This is a suitable site, which is available and in single ownership. It is likely the site could be delivered during the Local Plan period.</p>
Sustainability Assessment:	<p>Sustainable brownfield site with mostly positive or neutral scores. The business growth score is influenced by the loss of the existing business. However, good transport links and plentiful services make the site suitable for residential or for a mix of residential and commercial development.</p>
Conclusion:	<p>This site is considered unsuitable as a potential site allocation.</p>
Reason:	<p>Although this site is identified as a sustainable PDL site due to its location within the LBD, it is considered unsuitable as a potential site allocation because it is a valued existing economic use. It is noted that this does not necessarily preclude future redevelopment if the tests in Policy ED 2 are met in the future.</p>

Site Reference: PSPC_4

Site Address: Logistics UK, Hermes House and land to the rear, St Johns Road, Tunbridge Wells



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Map Dated: July 2021

Parish:	Royal Tunbridge Wells.
Settlement:	Royal Tunbridge Wells.
Gross area (ha):	0.65
Developable area (ha):	0.65
Site type:	Part PDL and part Greenfield site within LBD of RTW.
Potential site use:	Site has been assessed for development potential, notably for residential use.
Potential yield if residential:	48 dwellings
Issues to consider:	Mostly within LBD;

	Partly Rural Fringe (RF1 (1)) – Culverden Down, Royal Tunbridge Wells; HLC Period: Early 20th century; APA: Some Palaeolithic potential; General background archaeological potential; LCA: Urban, Wooded Farmland; ALC: URBAN; AQMA 80m Buffer.
Site Description:	The Site currently comprises offices in employment use with associated car parking, accessed from St John's Road and an area of grassland to the rear. There is residential development to the north, south and east, with educational use bounding the site to the west. The site consists of an unusual circular plan form building thought to have been originally constructed as a church and now used as office space. There is a later, more regular plan form extension, built in the late 1980's providing 2 floors of office accommodation. The site also includes land to the rear of Hermes House which is currently in education/recreation use as part of the Tunbridge Wells Girls Grammar School grounds. A small part of this land falls outside of the LBD and within the designated Rural Fringe. Vehicular and pedestrian access to the site is currently provided from St Johns Road.
Suitability:	This is considered to be a sustainable site as it is a PDL site that falls inside the LBD of RTW. It is well located for access to local services and facilities on the edge of the town centre. It is however a valued existing economic use and education use, worthy of retention. It is noted that this does not necessarily preclude future redevelopment if the tests in Policy ED 2 are met in the future.
Availability:	Available. Multiple ownership.
Achievability:	This is a suitable site, which is available and in multiple ownership. It is likely the site could be delivered during the Local Plan period.
Sustainability Assessment:	Largely sustainable brownfield site with mostly positive or neutral scores. However, the air quality score is scored negatively to reflect the site location within the AQMA buffer. The business growth score is influenced by the fact that the existing business is planning to relocate with the town. Reasonable transport links and service provision make the site suitable for residential development.
Conclusion:	This site is considered unsuitable as a potential site allocation.
Reason:	<p>Although this site is identified as a sustainable mostly PDL site due to its location within the LBD, it is considered unsuitable as a site allocation due to its existing economic/education use which is worthy of retention.</p> <p>It is noted that this does not necessarily preclude future redevelopment if the tests in Policy ED 2 are met in the future.</p>

**If you require this document in another format,
please contact:**

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