

Examination of the Tunbridge Wells Borough Local Plan – Stage 2

This statement has been submitted on behalf of our Client, Kevin Spencer, for the purposes of the Examination of the Tunbridge Wells Borough Local Plan. Mr Spencer is the owner of land at High View, Langton Road, Langton Green (SHELAA Site Reference: 42). The site is not proposed for allocation in the Plan. Comments are made in relation to:

- Matter 3 – Spatial Strategy and Distribution of Development; and
- Matter 4 – Principle of Green Belt Release.

Matter 3, Issue 1: Spatial Strategy

Question 3: What is the purpose of the Settlement Role and Function Study Update? How has it informed the Plan?

The Settlement Role and Function Study has clearly had very little influence on the selection of appropriate locations for new development.

Locating growth in the most sustainable locations should be at the heart of the spatial strategy. Indeed, this is an approach endorsed in the Sustainability Appraisal which highlights that, subject to local circumstances, looking at settlements with a broad range of services provides a better starting point for a sustainable development strategy. The Council should have given more weight to the findings from the Sustainability Appraisal and the information within the Settlement Role and Function Study Update to inform the development strategy. In doing so, the Council will ensure a more balanced and sustainable distribution of development.

This Settlement Role and Function Study looked at 21 villages and settlements and gave an indication of each settlement's level of sustainability and potential to accommodate further growth. The results are set out on the following Table. We ask the Inspector to give particular attention to the position of Langton Green, which appears in 8th place on the settlement hierarchy.

Settlement	1st score	2nd score	3rd score	4th score (average of 1 st , 2 nd , 3rd)	New weighted method
Southborough	161	165	115	147	100
Cranbrook	153	163	116	144	90
Paddock Wood	128	136	96	120	82
Hawkhurst	90	100	65	85	71
Rusthall	68	72	39	59.7	59
Pembury	64	70	42	58.7	55
Goudhurst	42	46	26	38	39
Langton Green	38	38	23	33	38
Benenden	38	42	21	33.4	37
Brenchley	35	39	19	31	35
Lamberhurst	34	38	19	30.2	33
Horsmonden	34	36	20	30	35
Sandhurst	34	36	20	30	32
Speldhurst	31	35	17	27.6	33
Five Oak Green	30	32	16	26	30
Sissinghurst	27	27	15	23	27
Bidborough	26	26	14	22	25
Matfield	23	23	15	20.3	21
Frittenden	19	19	12	16.7	19
Kilndown	18	18	12	16	16
Iden Green	11	11	7	9.7	11

Table 6: Revised settlement groupings

Grouping	Settlement
A	Royal Tunbridge Wells (RTW) *
B	Southborough*, Cranbrook, Paddock Wood and Hawkhurst
C	Rusthall and Pembury
D	Goudhurst, Langton Green, Benenden, Brenchley and Horsmonden
E	Lamberhurst, Speldhurst, Sandhurst, Five Oak Green, Sissinghurst and Bidborough
F	Matfield and Frittenden
G	Kilndown and Iden Green

*RTW and Southborough are also jointly considered as the main urban area

As part of this study, the Council also identified the characteristics of the settlements and put them into grouping based on the range of services and facilities on offer. Again, we ask the Inspector to look at the position that Langton Green holds – 4th on the grouping schedule (Grouping D).

Paragraph 5.1 of the Settlement Role and Function Study Update explains that: *“These groupings give an indication of the level of sustainability and appropriateness of these settlements to accommodate further growth in terms of access they provide to services and facilities that support their sustainability”*.

Yet, despite all this work and the conclusions from this study, **Langton Green has not been asked to accommodate any growth whatsoever over the next 15 years.**

Langton Green is an inherently sustainable settlement. This fact is recognised in the Council's own Settlement Role and Function Study which reveals that it has a 2-form entry Primary School, a Pre-school, a village hall, convenience stores, a petrol station, a church, various pubs and good public transport links. It is very much a desirable place to live, and critically, people can walk to the facilities mentioned above, thereby significantly limiting the need to travel by car. Furthermore, the settlement is well placed in terms of accessibility to larger towns and employment opportunities, lying approximately 2 miles west of Tunbridge Wells along the A264 and approximately 10 miles east of East Grinstead.

Taking this into account, it is considered entirely logical to sensitively grow Langton Green. The settlement has the capacity to deliver additional housing in the form of 'Land at High View, Langton Road, Langton Green' (SHELAA Site Ref: 42). This site has the capacity to deliver 20 - 24 dwellings and would play an important part in contributing to meeting the housing requirements of the area as well as being able to be built out quickly. It is a sustainable, deliverable and developable development opportunity and should be reconsidered and included as a site allocation to meet strategic housing need in Langton Green.

As previously set out in our representations on the Regulation 19 Plan, the Council's reliance upon strategic sites will inevitably take a long time to deliver. It is therefore imperative that more smaller housing sites come forward, allocated across a range of settlements, to ensure a proportionate distribution across the settlements as well as sustainable delivery early in the Plan period.

Overall, it is our assertion that the Settlement Role and Function Study serves very little purpose. It has not informed the Plan in any meaningful way, and this is particularly evident when it comes to the lack of any housing allocation whatsoever in the settlement of Langton Green. The Council's approach toward distributing development is fundamentally wrong – this has resulted in a clear failure to allocate land in a settlement which by the Council's own admission is sustainable.

The NPPF establishes at Paragraph 16a) that Plans should "be prepared with the objective of contributing to the achievement of sustainable development". In order to reach this objective, a balanced and more proportionate approach should be adopted in the spatial strategy in the emerging Plan, particularly with a view to ensuring that Langton Green is required to accommodate some growth.

We also wish to draw to the attention of the Inspector an inconsistency associated with Table 4 of the emerging Local Plan. In the interests of transparency, Table 4 should make it clearer that there are no housing allocations in Langton Green - like it has done with Bidborough. Under Speldhurst in the Parish/Settlement category there should be another row (in italics) identifying Langton Green and the fact that it will not be delivering any housing within the lifespan of the Plan.

Table 4 Distribution of housing allocations

Parish/Settlement	Local Plan allocations	
	Lower	Upper
Royal Tunbridge Wells	1,416	1,536
Southborough	42	42
Paddock Wood	3,932	4,032
<i>Strategic urban expansion*</i>	<i>3,490</i>	<i>3,590</i>
<i>Town centre</i>	<i>30</i>	<i>30</i>
Capel*	2,100	2,100
<i>Tudeley Village - new settlement</i>	<i>2,100</i>	<i>2,100</i>
Cranbrook and Sissinghurst	453	467
<i>Cranbrook</i>	<i>415</i>	<i>429</i>
<i>Sissinghurst</i>	<i>38</i>	<i>38</i>
Hawkhurst	161	170
Benenden	87	95
<i>Benenden</i>	<i>43</i>	<i>45</i>
<i>East End</i>	<i>44</i>	<i>50</i>
Bidborough	0	0
Brenchley and Matfield	56	60
Frittenden	25	30
Goudhurst	25	25
Horsmonden	240	320
Lamberhurst	25	30
Pembury	389	417
Rusthall	15	15
Sandhurst	20	30
Speldhurst	10	12
Sub-total	8,996	9,381
Allocations with existing planning permission (to be discounted to avoid double counting)	920	920
Total (with existing planning permission discounted)	8,076	8,461

Matter 3, Issue 2 – Distribution of Development

Question 1: How was the Distribution of Development Established? Has the Council sought to direct housing growth towards settlements based on their scoring in the Settlement Role and Function Study or by another means?

This is for the Council to answer. But clearly, when it comes to Langton Green, the Council have not sought to direct housing growth based on its score in the Settlement Role and Function Study.

Matter 3, Issue 2 – Distribution of Development

Question 3: Is the strategy consistent with paragraph 105 of the Framework which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?

In the case of Langton Green, clearly no. It is fundamentally wrong that Langton Green which is a demonstrably sustainable settlement is not taking any growth at all over the lifespan of the Plan.

In accordance with paragraph 105 of the Framework, a balanced and more proportionate approach should be adopted in the spatial strategy, particularly with a view to ensuring that Langton Green is required to accommodate some growth.

Matter 3, Issue 2 – Distribution of Development

Question 5: Where new development is proposed in town and villages, is the scale, type and distribution of housing development proportionate to their character, role and function?

It should be the case that the scale and distribution of housing sites directly follows from the settlement hierarchy. This would ensure that the most suitable and sustainable sites are proposed for allocation. Such an approach is endorsed in the Council's Sustainability Appraisal.

However, there are in fact clear flaws in the way in which housing allocations are being distributed across the Borough – not in the least with Langton Green which has not been asked to accommodate any growth at all over the Plan period. Given the character, role and function of this settlement the lack of any new provision of housing in Langton Green is unjustifiable.

For the reasons set out above, the spatial strategy set out in the emerging Plan does not accord with the sustainability goals set out in National Planning Policy Framework and as such the Plan should be found unsound.

Matter 4 – Principle of Green Belt Release

Issue 1, Question 6: When drawing up or review Green Belt boundaries, paragraph 142 of the Framework states that the need to promote sustainable patterns of development should be taken into account. How and where has the Council taken this into account?

By the Council's own admission, in order to meet housing needs, land will be required to be removed from the Green Belt. Accordingly, it is important that the Council makes sure that any sites being released from the Green Belt are distributed in accordance with their scoring in the Settlement Role and Function Study to ensure that growth is located in the most sustainable locations.

The emerging Plan does not explain why the decision has been taken to alter the boundaries of the Green Belt in Pembury, Southborough, Rusthall, Speldhurst but not in Langton Green. In fact, Table 4 of the Plan fails to mention Langton Green whatsoever (as explained previously in this Hearing

Statement under Matter 3, Issue 1: Spatial Strategy). This lack of growth in Langton Green should be made clearer in the Plan and an explanation should be given as to why a decision has been made not to allow any new allocations in this settlement.

As stated above, Langton Green is an inherently sustainable settlement. It scores highly in Council's Settlement Role and Function Study yet despite this there are still no sites allocated for housing in this settlement.

Take for instance, Land at High View, Langton Road (SHELAA Ref: 42). The SHELAA site assessment sheet (attached for reference) identifies that the main reason why the site has not come forward for allocation is because of wider concerns about the release of the site from the Green Belt.

However, paragraph 142 from the NPPF makes it clear that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. In other words, small local adjustments to the Green Belt boundary sites may be acceptable for sites that are in sustainable locations and well served by public transport. It is our assertion that Land at High View falls directly into this category. Furthermore, the landscape characteristics and wooded enclosure to the south mean that the site is already visually contained. This site therefore represents a logical extension to the existing development of Langton Green. Given the findings of the Settlement Role and Function Study (the fact that Langton Green falls in grouping D - 4th in the revised settlement group alongside other settlements that are taking a significant proportion of growth such as Horsmonden and above other settlements that are in the Green Belt which are allowed to grow - such as Speldhurst), it seems entirely logical that the Green Belt boundary of Langton Green should be adjusted to address future development needs. Langton Green is a sustainable settlement and Land at High View should be released from the Green Belt in line with paragraph 142 of the NPPF.

Tunbridge Wells Borough



Tunbridge Wells Borough Council

Site Assessment Sheets for Speldhurst Parish

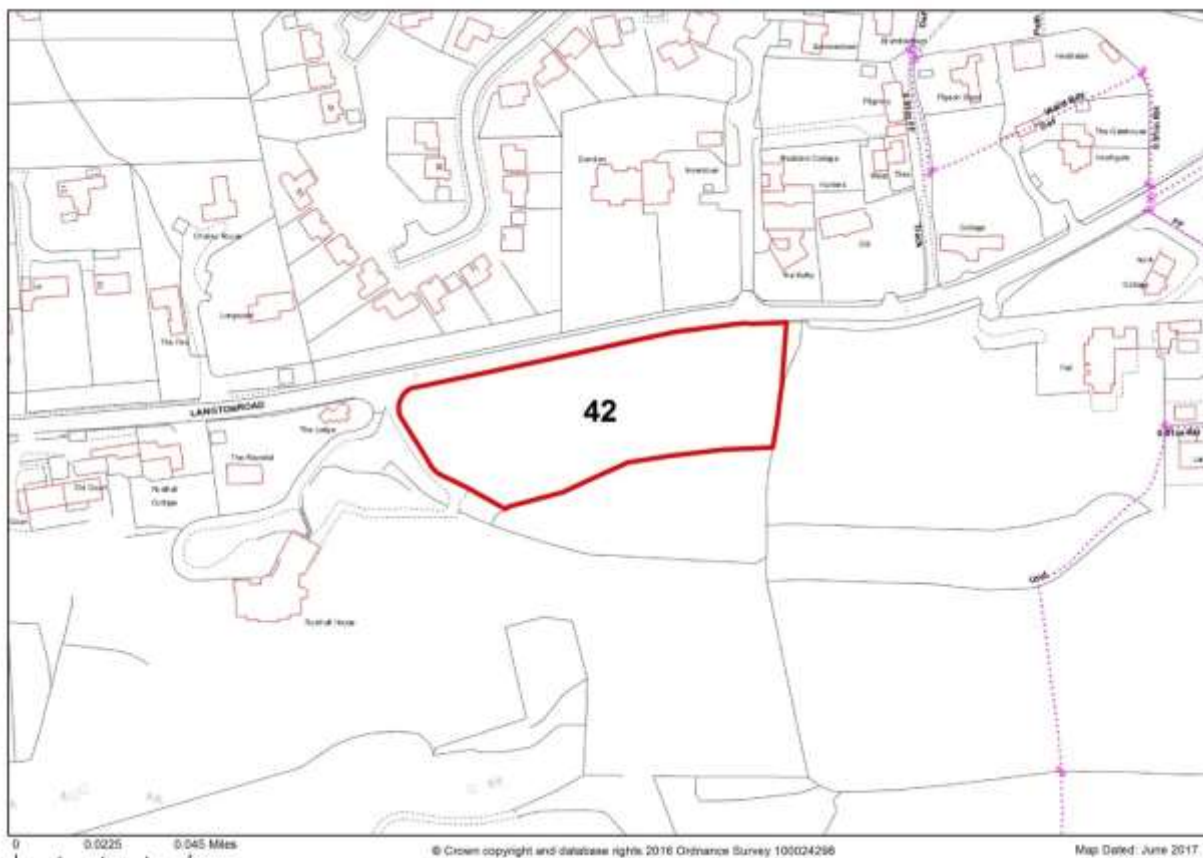
Strategic Housing and Economic Land Availability
Assessment – Regulation 19 Consultation

January 2021



Site Reference: 42

Site Address: Land at High View, Langton Road, Langton Green



Parish:	Speldhurst
Settlement:	Langton Green
Gross area (ha):	0.78
Developable area (ha):	0.78
Site type:	Greenfield site adjacent to LBD
Potential site use:	Site has been assessed for development potential, notably for residential use.
Potential yield if residential:	24
Issues to consider:	TPO; MGB; 2016 Landscape Designation (SP20); HLC Period: Assart Fields, Medieval; Common Land; APA: General background archaeological potential; ALC: URBAN, GRADE 3; LCA: Urban, Wooded Farmland; Adjacent to existing Limits to Built Development
Site Description:	The site consists of a parcel of green field land that is not

	<p>agricultural. There are two structures on the site. The site is adjoined by residential properties to the north and west. There are fields in the wider locality.</p> <p>Site boundaries consist of hedging and trees along the frontage with Langton Road. There is hedging along the southern and eastern boundaries. The western boundary consists of hedging and a gate onto the access track. There is direct vehicular access off Langton Road through a set of gates. There is a further access point off the driveway to Rusthall House. Pedestrian access is through the gates/access point. There is a pavement along the northern side of Langton Road and pavements in the wider locality. There is a gentle slope south from Langton Road and a slight bank along the frontage with Langton Road. There are public views of the site from Langton Road mostly consisting of glimpses through the hedging. There are more exposed views along by the access gate where the hedge has less cover currently.</p>
Suitability:	Unsuitable because there are landscape concerns and concern about the release of the site from the Green Belt, the site forming part of a broader parcel with very high impact if released from the Green Belt.
Availability:	Available Single ownership
Achievability:	N/A
Sustainability Assessment:	A site with many neutral scores that scores positive for housing provision and neutral/negative in terms of travel. Its score is let down by demand for school places and land use and landscape impacts, being the loss of a greenfield site in the AONB which forms part of a broader parcel with very high impact if released from the Green Belt. Score informed however by the fact this is a relatively small site.
Conclusion:	This site is considered unsuitable as a potential site allocation.
Reason:	As set out in the suitability box, there are landscape and Green Belt concerns relating to this site, which if released would cause very high harm.