

Examination of the Tunbridge Wells
Borough Local Plan

**Tunbridge Wells Borough Council
Hearing Statement**

**Matter 8: Meeting Housing
Needs (Policies H1, H2, H3,
H4, H5, H6, H7, H8, H9, H10,
H11 and H12)
Issue 2: Housing Density**

Document Reference: TWLP/028



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Matter 8 – Meeting Housing Needs (Policies H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11 and H12)

Issue 2 – Housing Density

Inspector’s Question 1: [re. clarity of Policy H 2 requirements]

Is it sufficiently clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy H2?

TWBC response to Question 1

Introduction

1. Policy H2: Housing Density is considered to be sufficiently clear. The policy states that:
“Development should make efficient use of land, having full regard to the context of the site, including its character, landscape setting, topography, surrounding built form, and access to infrastructure and services.”
2. This sets out a clear guiding principle that efficient use of land should be achieved subject to relevant contextual considerations. Furthermore, it aligns with paragraph 124 of the [NPPF](#) which seeks the efficient use of land having regard to a number of criteria, including the capacity of infrastructure and services to support development and the prevailing character of an area.
3. Paragraph 6.3.14 of the supporting text of Policy H2 provides further clarity. It states:
“Existing and proposed infrastructure will help inform appropriate densities, with more sustainable areas that provide, or will provide, good infrastructure and transport links able to support higher densities.” It also concludes that *“Where it is considered that a proposal would not make efficient use of land and that a higher density would be more appropriate, especially where the site is in a central or otherwise accessible location, it would be expected to be refused”*.

4. This provides a clear message that the policy aims to make efficient use of land by encouraging higher densities in sustainable locations which have good links to services and infrastructure. This also aligns with the Development Strategy of the Local Plan, as set out in criterion 2 of Policy STR3: Brownfield Land, which states:

“Proposals that provide for the effective use of redundant, disused, or under-utilised brownfield land and buildings in sustainable locations will be supported in principle.

In particular: ...

2. Such proposals either within, or in short walking distance of, town and rural service centres, as defined in Policy ED 9: Defined Town and Rural Service Centres, will be expected to make optimal use of land and buildings in accordance with Policy EN 1: Sustainable Design and, where relevant, Policy H 2: Housing Density.”

5. In conclusion, it is considered that the policy, supported by the wording of the explanatory text, provides a clear policy foundation to guide the formulation of development proposals and an appropriate policy framework for their subsequent assessment and consideration.

Inspector's Question 2: [re. optimising use of land in accessible locations]

How does the Plan seek to optimise the use of land for development in town centres and other locations that are well served by public transport?

TWBC response to Question 2

6. As set out in response to Question 1 above, the guiding principle of Policy H2: Housing Density, is to make efficient use of land having regard to a number of factors, including access to infrastructure and services.
7. The supporting text, at paragraph 6.3.14, provides helpful explanatory context: *“Existing and proposed infrastructure will help inform appropriate densities, with more sustainable areas that provide, or will provide, good infrastructure and transport links able to support higher densities. (see Policies STR 5: Infrastructure and Connectivity, STR 6: Transport and Parking, and TP 2: Transport Design and Accessibility). Where it is considered that a proposal would not make efficient use of land and that a higher density would be more appropriate, especially where the site is in a central or otherwise accessible location, it would be expected to be refused”.* (TWBC underlining)
8. Looking beyond Policy H2, criterion 2 of strategic policy STR3: Brownfield Land (as quoted at paragraph 4 under Question 1 above) expects development on brownfield land within, or in short walking distance of, town and rural service centres to make optimal use of land and buildings.
9. In terms of its specific spatial application, the Strategy for Royal Tunbridge Wells, Policy STR/RTW1, requires proposals to:

“Make the best use of previously developed land by the intensification of uses/sites whilst still protecting the town’s important character and heritage.”
10. The development potential of the town centre itself is being addressed through a separate Local Plan. However, it is noted that Policy STR/RTW2, but it is important that the Local Plan’s Strategy for Royal Tunbridge Wells Town Centre sets out the expectation, at criterion 8, that it will accommodate:

“Increased residential development as part of the appropriate mix of uses within the town centre to ensure a vibrant and viable centre. In addition to those sites which already have planning permission, or are subject to detailed allocations below, at least 150-200 additional residential units will be provided in the town centre.”

11. The town centre, or edge of centre, sites actually proposed to be allocated in the current Local Plan will all involve relatively high-density development. These include:
- Some 100 apartment dwellings (or more – see Hearing Statement on Matter 8, Issue 6) as part of mixed-use redevelopment of the Former Cinema Site, Mount Pleasant Road (Policy AL/RTW1)
 - Housing with a mix of town centre uses at Land at the Auction House, Linden Park Road (Policy AL/RTW2)
 - AL/RTW3: Land at Lifestyle Ford, is to the north of the Royal Tunbridge Wells Town Centre Boundary and is allocated for some 100 dwellings, equating to a density of over 200 dwellings per hectare¹.
12. The Local Plan provides overarching policies to optimise the use of land for development in accessible sites, essentially in Policy H2, supported by Policy STR3. Furthermore, the application of the policies is illustrated in centrally located site allocations.

¹ See Brownfield and Urban Land Topic Paper [[CD 3.83](#)]