

Mr M. Birkinshaw BA(Hons) MSc MRTPI
 C/O Banks Solutions
 80 Lavinia Way
 East Preston
 West Sussex
 BN16 1DD

10th May 2022

Dear Mr M. Birkinshaw,

Examination of the Tunbridge Wells Borough Local Plan – Response to Matter 2 (Issue 1)

CBRE is instructed by Dandara in respect of their land interests within the Tunbridge Well Borough Local Plan (hereafter ‘the Plan’). With specific reference to the proposed allocations within the Plan their interest includes:

- **STR/PW1 / STR/SS1 – Badsell Farm, Paddock Wood (‘Paddock Wood’);**
- **STR/HA1 / AL/HA4 – Land off Copthall Avenue and Highgate Hill, Hawkhurst (‘Hawkhurst’);**
- **STR/RTW1 / AL/RTW5 – Land at Speldhurst Road, Southborough (‘Southborough’).**

Dandara also hold interest at **AL/RTW16 – Land to the West of Eridge Road at Spratsbrook Farm (‘Spratsbrook Farm’)** and representations in respect of this site are submitted by Barton Willmore. Please note Barton Willmore have prepared specific responses to Matter 2: Issue 1 - Housing Needs and the Housing Requirement: Questions 1-4.

Dandara also have interest in the Land East of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road (‘Sissinghurst’) which for the purpose of the Plan is an omission site.

Response to Matter 2, Issue 1 – Housing Needs and the Housing Requirement (Questions 5 and 6)

Q5. Do policies relating to the Green Belt and/or the High Weald AONB provide a strong reason for restricting the scale of development in Tunbridge Wells?

Q6. Is the housing requirement justified, having particular regard to areas of Green Belt and AONB across Tunbridge Wells?

There is significant overlap in the questions posed above and as such we respond to them collectively.

The Planning for the Right Homes in the Right Places consultation provides useful data with which to respond to the above question. Data provided as part of the consultation provides a figure for the proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest (in short the primary constraints that are identified by footnote 7 of the NPPF). Tunbridge Wells is noted as having 75% coverage. Higher still, Guildford Borough Council is noted as being covered by 89%.

The Guildford Borough Council Local Plan, against this constraint, has recently been found sound in seeking to accommodate the full objectively assessed need for housing. In addition, the interim conclusions of the Inspector in

the Examination of the Epping Forest Local Plan support a reduce in the housing target by only circa 1,000 homes across the entire plan period owing to the constraints that exist in the District. The situation in Epping Forest is however extreme with 94% coverage by the constraints set out above.

In meeting the Framework’s objective to ‘significantly boost the supply of homes’ it is important that this is seen as a collective effort amongst local planning authorities with all areas making their contribution to drive up overall supply and improve levels of affordability as well as meeting a much needed social aim. Set against the recent experiences of Guildford Borough Council and Epping Forest District Council there is no compelling evidence in respect of the constraints in the area that would justify a reduction in the approach of the Local Plan.

The approach that has been taken by the Council is entirely consistent with the principles that are established through the Calverton Judgement (refer to Matter 4).

From the Council’s growth strategy options outlined in their Sustainability Appraisal (‘SA’) 2021 (**Core Document 3.130**) it is evident that growth strategy options that proposed no Green Belt loss or development in the AONB result in significant negative scoring in respect of the economy. The Council’s preferred growth strategy is balanced and considered in combining strategic growth by focussing on settlements with the best services and facilities, but also with some growth to smaller settlements, whilst providing proportional growth within the AONB. Dandara consider this to be a robust and sound approach in reference to national policy and the three-pronged sustainability objectives of the NPPF set out in Paragraph 8.

Dandara therefore consider the Council’s preferred growth strategy which includes some Green Belt loss and proportional growth in the AONB to be justified factoring in the borough’s landscape and other physical constraints, need to satisfy its housing and employment needs, whilst achieving sustainable development and balancing social, economic and environmental sustainability objectives in line with national policy. Dandara consider the Council’s growth strategy and SA to be robust, justified and consistent with national policy as required by paragraphs 35 (b and d) of the NPPF.

We would be grateful if the Programme Officer could confirm receipt of this response.

Yours sincerely,



Adam Kindred
Director
CBRE Ltd

cc. Ben Shaw – Senior Planning Manager, Dandara