

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Hearing Statement

Matter 5: The Strategy for Hawkhurst **Issue 2: March's Field, Limes Grove, Gill's Green – Policy AL/HA8**

Document Reference: TWLP/129



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Matter 5 – The Strategy for Hawkhurst

Issue 2 – March’s Field, Limes Grove, Gill’s Green – Policy AL/HA8

Inspector’s Question 1: [re. justification for suggested changes]

Do the suggested changes adequately address the issues identified in the Inspector’s Initial Findings? If not, what changes are necessary to make the Plan sound?

TWBC response to Question 1

Introduction

1. The site is a former woodyard located opposite, to the north of, the business park at Gill’s Green. There are no existing buildings on the site. In the Submission Local Plan (SLP) [[CD 3.128](#)], the site was reserved for future employment uses (use classes B2/B8/E). The site was to be released if monitoring indicated that other employment allocations had not come forward, or there was evidence that further employment provision is required in the eastern part of the borough or, alternatively, that it be released potentially at the five-year review of the Local Plan.
2. The Inspector noted in paras 77-80 of his Initial Findings Letter (ID-012) that Limes Grove is a narrow country lane, with limited visibility of oncoming traffic, and with no footpath to the main entrance to the business park or the bus stops on the A229. As such the site would be ‘wholly unsuitable for unrestricted commercial uses where the loading and unloading of large vehicles was necessary’. The Inspector subsequently advised it may be possible to identify a smaller, less intensive ancillary use associated with the business park.

Consideration

3. To establish whether there could be any suitable, smaller, less intensive ancillary uses associated with the business park that could form part of a site allocation in the Local Plan, the Council liaised further with KCC Highways upon receipt of the Inspector's initial findings. KCC Highways was specifically asked to consider development options for the site to inform the decisions about the continued allocation of the site. In light of the Inspector's initial findings, vehicular and pedestrian access were considered significant constraints to development of the site.
4. Therefore, to assist with further consideration of the site, Council officers set out the following three options to KCC Highways for its consideration and advice:
 - Option 1: The provision of parking for the occupiers of the adjacent Hawkhurst Station Business Park, to provide 55 – 93 spaces.

This proposed use is informed by proposals put forward for the site by planning application [20/00821/FULL](#) for the use and laying out as a car park with a new access to Limes Grove; surfacing, landscaping, security low level lighting and CCTV, and pedestrian access to the Business Park along its existing emergency/service access drive to Limes Grove. This proposed scheme was to provide 90 spaces to serve occupiers of the adjacent Hawkhurst Station Business Park.

The planning application was subsequently withdrawn by the applicant. Although the proposal included options to realign the junction of Limes Grove with the A229, KCC Highways advised that due to the alignment of the main road and land constraints to the north of the junction, any realignment of the minor road would not bring forward any significant improvement. KCC Highways concluded that the significant increase in use of Limes Grove, that they described as a narrow lane without passing opportunities, coupled with the increased use of the junction with the A229 raised highway safety concerns. For these reasons the highway authority was unable to support the proposal (see KCC Highway comments under the list of documents for [20/00821/FULL](#)).

- Option 2: If the provision of 55 – 93 parking for the occupiers of the adjacent Hawkhurst Station Business Park is not supported by KCC Highways, is there a smaller scale of parking that would be supported?
- Option 3: A small scale, less intrusive commercial use associated with the adjacent Hawkhurst Station Business Park, for example a B8 storage use.

5. KCC Highways provided the following advice on the site, and as shown in **Appendix 2**:

‘Lime Groves is a narrow country lane, its width is insufficient for two vehicles to pass and visibility at its junction with the A229 Cranbrook Road is substandard. There is no footway along Limes Grove and no footway link to the nearest bus stops along the A229 Cranbrook Road.

The intensification of use of Limes Grove and its junction with the A229 by both traffic and pedestrians would be detrimental to highway safety and therefore the Highway Authority would not support any of the three options put forward for the allocation of the site in the Local Plan.

It is noted that the site was formerly used as a woodyard and I would question whether there is an extant use. If this is the case further consideration can be given bearing in mind the traffic generation associated with that extant use’.

6. Following receiving this advice, officers carried out detailed research into the previous uses of the site, including as a woodyard. This has included investigation of historical aerial photographs and the outcome of a planning enforcement investigation in 2012 when the site was being used for lorry parking, store tanks, steel containers, cement mixers and other plant. The enforcement investigation reported that the site only appears as open land on previous aerial photos. A previous timber storage use brought to the attention of the enforcement process by the landowner has long-since been abandoned. As a consequence of the above, it is considered that there are no extant uses applicable to the site, which would form a material planning consideration in decisions made about the continued allocation of the site in the Local Plan following the initial findings of the Inspector’.
7. Given that KCC Highways has confirmed it would not support any of the three options in the absence of an extant consent, which would be a material planning consideration, the

Council proposes to delete site allocation Policy AL/HA 8 Limes Grove (March's Field), Gill's Green, Hawkhurst from the emerging Local Plan. This proposed change is set out in section 7.2 and appendix G of the Development Strategy Topic Paper [\[PS_054\]](#), with the deletion of the policy also shown in **Appendix 1** of this document. This is required to make the plan sound for the following reasons:

- The site does not have any existing lawful uses. This has been confirmed by the outcome of a TWBC Planning Enforcement Notice in 2012. Since this date there have been no approved uses for the site.
- KCC Highways have confirmed that they would not support planning proposals for the intensification of use of Limes Grove and its junction with the A229 by both traffic and pedestrians, concluding that such proposals would be detrimental to highway safety. Therefore, it is clear there is unlikely to be an appropriate use for the site, and thus, the allocation is undeliverable and should be removed from the Local Plan.
- In terms of employment need and allocations, SLP Policy AL/HA 7 Hawkhurst Station Business Park allocates an area of land at the Hawkhurst Business Centre (identified as a Key Employment Area by SLP Policy ED1 The Key Employment Areas, KEA), located immediately to the south of Limes Grove (March's Field), for employment uses (E/B2/B8). This allocation provides sufficient land to support the growth of the existing business park, and thus meet the employment needs of both the surrounding area as well as the eastern part of the borough.
- The revised SLP Table 5 'Employment land allocations identified in the Local Plan' in the Development Strategy Topic Paper Addendum [\[PS_054\]](#) shows that 1.2 hectares of land is to be delivered for employment uses by Policy AL/HA 7. The total amount of employment space in the revised strategy is 23.12 hectares, reduced from 26.5 hectares in the SLP. However, the employment allocations in Hawkhurst, and the eastern part of the borough remain the same (the figures exclude the site at Limes Grove as Policy AL/HA 8 only reserved the site if required for future release). The deletion of Policy AL/HA 8 would not have any impact upon the delivery of development through Policy AL/HA 7, and therefore would have no impact upon the delivery of sufficient employment land in the eastern part of the borough.

- Through the set of changes to the Local Plan suggested through the Development Strategy Topic Paper Addendum [[PS 054](#)], the Council is proposing to commit to an early review of the Local Plan. This will provide an opportunity to reassess the employment needs and provision in the eastern part of the borough, and if required, identify new suitable site(s).

Appendices

Appendix 1: Proposed changes to Policy AL/HA 8 – Site at Limes Grove (March's Field)

Site at Limes Grove (March's Field)

This site is a former woodyard located opposite, to the north of, the business park at Gill's Green. There are no existing buildings on the site.

The site area is 0.63 hectares.

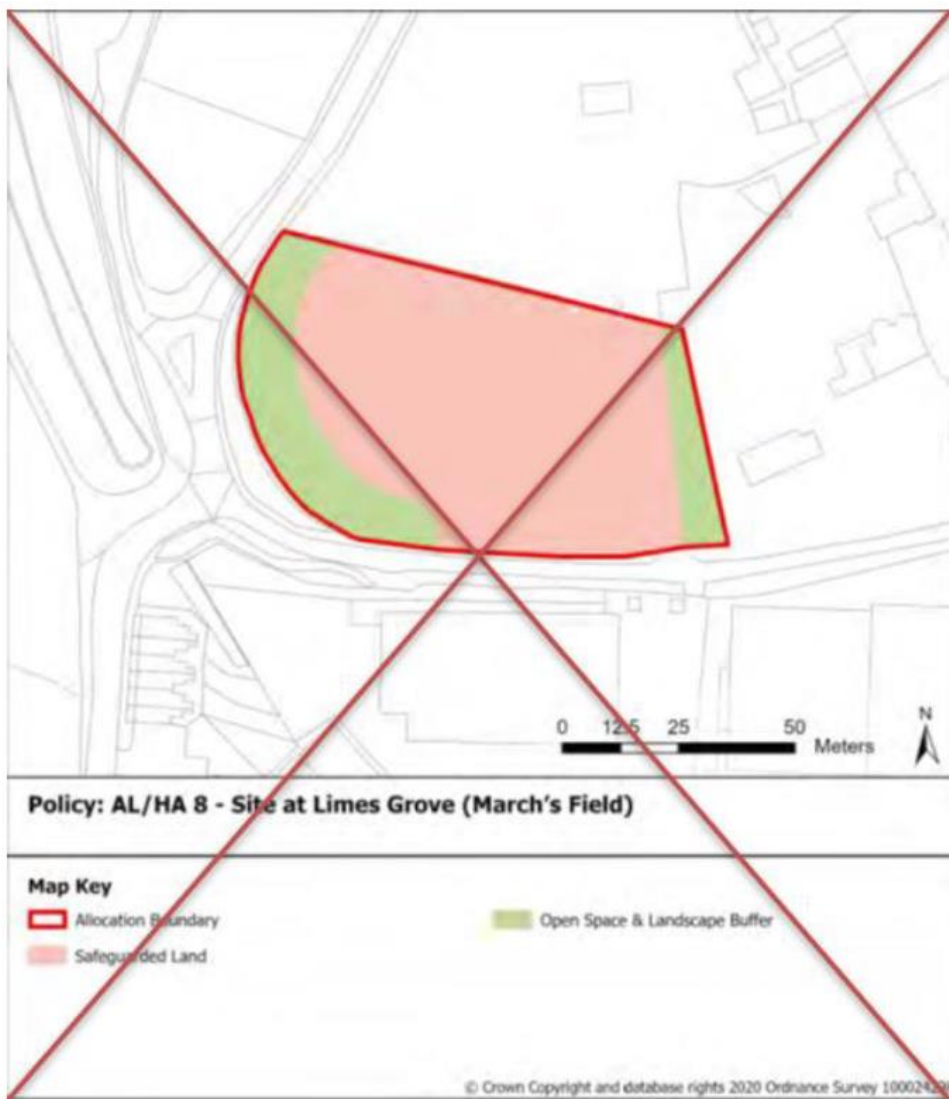
The site is within the High Weald AONB, located some distance from the centre of Hawkhurst to the south.

The site is located adjacent to Limes Grove, from which it has a vehicular access at the south-eastern corner of the site. To the east of the site is the junction of Limes Grove with Cranbrook Road (the A229). The site is adjacent to a number of Grade II listed buildings and a farmstead.

The boundaries of the site consist of open chain link fencing to the back of the site. The front boundary of the site with Limes Grove comprises tall leylandii hedging. There are trees along the remaining boundary. The site is close to the Hop Pickers Railway Line.

In view of the proposed extension to the existing Hawkhurst Station Business Park to the south under Policy HA 7, it is not clear whether further employment land will be required. However, to provide some contingency, it is considered reasonable to reserve this site for such purposes to be released only if there is a demonstrable need, either because monitoring indicates that other employment allocations have not come forward, or there is evidence that further employment provision is required in the eastern part of the borough. If the site is not required in the plan period, it would still be appropriate to safeguard it for employment in the longer term.

The topography of the site slopes up to the north from Limes Grove and then levels out. The middle area of the site is a flat plateau. There are partial views into the site from Limes Grove. There are more open views of the site from the adjacent land to the north.



Policy AL/HA 8

Site at Limes Grove (March's Field)

This site, as defined on the Gill's Green Hawkhurst Policies Map, is reserved for employment uses (E/B2/B8), to be released for development if monitoring indicates that other employment allocations have not come forward, or there is evidence that further employment provision is required in the eastern part of the borough, or potentially at the five-year review of the Local Plan.

Development on the site shall accord with the following requirements:

1. The design sensitive to the adjacent historic farmstead and listed buildings;
2. A landscape and visual impact assessment that informs the height and massing of development proposals, to include the height and colour of roofs, and reflects the elevated rural location of the site that can be viewed from parts of the surrounding areas;

- ~~3. Provision of a landscape management scheme to ensure any impact of development upon the surrounding rural area is minimised in perpetuity, including landscape boundaries of native species;~~
- ~~4. There is no unacceptable impact on air quality, having regard to any mitigation measures provided;~~
- ~~5. The design and layout is to be informed by a comprehensive energy and climate change strategy;~~
- ~~6. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy STR/HA 1.~~

~~In addition to the criteria in the above Policy, the relevant Policies that should be referred to in the Local Plan include: Policies EN 1: Sustainable Design; EN 3: Climate Change Mitigation and Adaptation; EN 5: Heritage Assets; EN 12: Trees, Woodland, Hedges, and Development; EN 18: Rural Landscape; EN 19: The High Weald Area of Outstanding Natural Beauty; EN 21: Air Quality; and EN 22: Air Quality Management Areas;.~~

Appendix 2: KCC Highways response to proposed development options at Limes Grove



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Date: 21 March 2023

Our Ref: LRG

Application - TWBC Policy AL/HA8

Location - Site at Limes Grove, Hawkhurst

Proposal - Option 1 - The provision of parking for the occupiers of the adjacent Hawkhurst Station Business Park, to provide 55 – 93 spaces

Option 2 - If the provision of 55 – 93 parking for the occupiers of the adjacent Hawkhurst Station Business Park is not supported by KCC Highways, is there a smaller scale of parking that would be supported? or:

Option 3 - A small scale, less intrusive commercial use associated with the adjacent Hawkhurst Station Business Park, for example a B8 storage use.

Dear Deborah

Thank you for your letter of 9 March 2023 in relation to the above named site. I have reviewed the three options put forward for potential site allocation in the Local Plan and my comments are as follows:

Lime Groves is a narrow country lane, its width is insufficient for two vehicles to pass and visibility at its junction with the A229 Cranbrook Road is substandard. There is no footway along Limes Grove and no footway link to the nearest bus stops along the A229 Cranbrook Road.

The intensification of use of Limes Grove and its junction with the A229 by both traffic and pedestrians would be detrimental to highway safety and therefore the Highway Authority would not support any of the three options put forward for the allocation of the site in the Local Plan.

It is noted that the site was formerly used as a woodyard and I would question whether there is an extant use. If this is the case further consideration can be given bearing in mind the traffic generation associated with that extant use.

Yours sincerely

Director of Highways & Transportation