
EXAMINATION STATEMENT – MATTER 03

Spatial Strategy and Distribution of Development

Tunbridge Wells Local Plan

Representations on behalf of
Dandara South-East Ltd

May 2022

EXAMINATION STATEMENT – MATTER 03
SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT
TUNBRIDGE WELLS LOCAL PLAN
REPRESENTATIONS ON BEHALF OF:
DANDARA SOUTH-EAST LTD
MAY 2022

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1.0 INTRODUCTION

1.1 This Statement has been prepared by Barton Willmore now Stantec on behalf of Dandara South-East Ltd. Barton Willmore is acting on behalf of Dandara regarding its land interest at "Land west of Eridge Road and Spratsbrook Farm", Tunbridge Wells – an allocated site of approx. 120 dwellings (Policy AL/RTW16) in the emerging Tunbridge Wells Local Plan.

1.2 Dandara broadly supports the Local Plan and is submitting other Matter Statements to the examination, as prepared by CBRE. This Matter Statement focuses on the "spatial strategy and distribution of development" elements to the Local Plan, and its conclusions can be summarised as follows:

- The Local Plan effectively grapples with the land use constraints in the Borough. This includes up to 75% of the Borough area as forming Green Belt, AONB or SSSI.
- At Tunbridge Wells, allocations are predominantly proposed on previously developed and greenfield sites in the urban area of the Town. Green Belt releases for residential development only occur at 3no. sites in the Town at Spratsbrook Farm, Caenwood Farm, and Tunbridge Wells Garden Centre. This is considered an appropriate balance of sites identified at the Town.
- Development at Spratsbrook Farm provides a sensitive development in an area that makes a "low-moderate" contribution to the role and function of the Green Belt. Furthermore, it respects the setting to the AONB.
- The site is situated in close proximity to the Town Centre including other facilities, namely retail, rail and education. Equally, there are no known infrastructure constraints to prevent the scale and type of development proposed at the site. It is a suitable location for high quality development in the Main Urban area of the Borough.

2.0 RESPONSE TO MATTER 03: SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT

QUESTIONS

Issue 1 – Spatial Strategy

- Q.7 The Development Strategy Topic Paper refers to constraints such as Green Belt, High Weald AONB and areas of flood risk. Which areas of the Borough are not constrained by flooding and/or Green Belt and AONB? Why could housing needs not be met in these areas?*
- Q.8 Could housing needs be met in a way that did not require land to be removed from the Green Belt and/or require development in the AONB?*
- Q.9 Do policies relating to the Green Belt, the High Weald AONB and/or flood risk provide a strong reason for restricting the scale, type and distribution of development in Tunbridge Wells?*

Issue 2 – Distribution of Development

- Q.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?*

- 2.1 The answers to these questions are intertwined so are therefore set out below.
- 2.2 Up to 75% of the Tunbridge Wells Borough area comprises land use constraints including Green Belt, High Weald AONB and Sites of Special Scientific Interest. Most settlements in the Borough are therefore either broadly surrounded by such constraints or are “washed over” by them.
- 2.3 Only 2no. small settlements sit outside Green Belt or AONB. These are Frittenden and Horsmonden. Options for growth at these settlements were tested at the Regulation 18 stages of the Local Plan and were discounted for reasons relating to the rural character/nature of the settlements including a lack of suitable highways infrastructure.

- 2.4 Accordingly, there is a compelling case for locating development at Tunbridge Wells/Southborough (Main Urban Area), as well as at *inter-alia* Paddock Wood, Hawkhurst and Cranbrook. These are the most sustainable settlements in the Borough with access to numerous shops, services, public transport options, etc.
- 2.5 Our client's land at Spratsbrook Farm forms a suitable allocated site at the southern edge of Tunbridge Wells town. Details regarding the site will be addressed in full in our subsequent Matter 07 Statement (Residential Site Allocations). The site forms Green Belt land along the southern confines of the Town and the western element of it comprises AONB (High Weald). The western part of the site has been recognised as being sensitive in landscape terms¹ and is therefore being proposed to be retained as green space, i.e., as amenity/natural green space.
- 2.6 We note that the site performs a "low-moderate" function towards the purposes of the Green Belt and the exceptional circumstances for Green Belt release at this location will be addressed further in our Matter 04/07 Statements.
- 2.7 Against the land use background, the Local Plan has broadly balanced the requirement to meet housing needs in addition to identifying development at sustainable locations. In this context, Spratsbrook Farm sits at the southern edge of Tunbridge Wells town in close proximity to the Town Centre including other facilities, namely retail, rail and education. Equally, there are no known infrastructure constraints to prevent the scale and type of development proposed at the site. It is a suitable location for high quality development in the Main Urban area of the Borough.
- 2.8 The scale of the development at this location is considered appropriate in its context, adjacent the settlement edge of Tunbridge Wells. The spatial strategy for the Town proposes the delivery of 18no. allocated sites amounting to 1,416 – 1,536no. dwellings. These largely occur on brownfield/previously developed sites (10 sites) in the Town, as well as greenfield sites (5 sites) inset within the urban area/outside Green Belt. Only 3no. Green Belt releases occur for residential development at Spratsbrook Farm, Caenwood Farm and Tunbridge Wells Garden Centre, and this is considered an appropriate balance of sites identified at the Town. In this regard the development at Spratsbrook Farm makes an appropriate contribution to the scale of development earmarked at Tunbridge Wells.

¹ Refer to TWBC Landscape Visual Impact Assessment (Nov 2020)

Summary

- 2.9 The Local Plan positively grapples with the land use constraints in the Borough. This includes up to 75% of the Borough area as forming Green Belt, AONB or SSSI.
- 2.10 At Tunbridge Wells, allocations are predominantly proposed on previously developed and greenfield sites in the urban area of the Town. Green Belt releases only occur at 3no. sites (including Spratsbrook Farm) and this is considered an appropriate balance of sites identified at the Town. In this regard, the development at Spratsbrook Farm provides a sensitive development in an area that makes a “low-moderate” contribution to the role and function of the Green Belt. Furthermore, it respects the setting to the AONB.
- 2.11 The site is situated in close proximity to the Town Centre including other facilities, namely retail, rail and education. Equally, there are no known infrastructure constraints to prevent the scale and type of development proposed at the site. It is a suitable location for high quality development in the Main Urban area of the Borough.