

**TWBC Local Plan Examination - Matter 5 – Site
Selection Methodology**
Statement on behalf of Bellway

May 2022

Contents

1.	Introduction	3
2.	Response Matter 5 – Site Selection Methodology	4

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Client
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1. Introduction

- 1.1 This Statement provides a response on behalf of Bellway to Matter 5 (Site Selection Methodology) of the Examination into the Tunbridge Wells Borough Local Plan.
- 1.2 Bellway has a legal interest in the land to the north and south of High Woods Lane (Mouseden Farm) on the eastern edge of the built up area of Tunbridge Wells/Hawkenbury which it is promoting for residential led development. The site is separated by High Woods Lane. The area south of High Woods Lane is currently in agricultural use and bordered to the east by woodland, to the south by existing sports uses and to the west by existing residential development. The area north of High Woods Lane is also within agricultural use, with further agricultural uses/woodland to the east and an indoor bowls club and allotments to the west.
- 1.3 The draft Policies Map indicates that the southern part of the land (south of High Woods Lane) is to be designated under Policy AL/RTW19 for new and enhanced sport and recreation provision as part of a new stadia sports hub. The northern part of the land promoted by Bellway is not subject to any other proposed allocations. The draft Policies Map appears to indicate that both parts of the site will continue to be located within the Green Belt and AONB.
- 1.4 The southern part of the land promoted by Bellway (i.e. the land south of High Woods Lane) is subject to a planning permission for recreational uses. That application was submitted by the Borough Council, despite it having no interest in the land. In contrast, Bellway has a legal interest in the land and is promoting this area, as part of a wider site, for residential development. Bellway would be willing to work with the Borough Council to explore opportunities for bringing forward the approved recreational facilities in the area, which residential development on the site could help deliver.

2. Response Matter 5 – Site Selection Methodology

2.1 This section provides a response to Matter 5, but we are conscious of the fact that the purpose of the Examination is not to consider omission sites. Instead, we therefore refer to flaws in the Council’s approach, having regard to the way in which the land promoted by Bellway was considered.

Issue 1 – Site Selection Methodology

Q1. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

2.2 No comment.

Q2. How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?

2.3 No comment.

Q3. In deciding whether to allocate sites for development, how did the Council take into account the effects of development on:

- **Landscape character, including the High Weald AONB and its setting;**
- **The availability of best and most versatile agricultural land;**
- **The local and strategic road network;**
- **The need for new and improved infrastructure (including community facilities);**
- **Heritage assets; and**
- **Nature conservation.**

2.4 As far as we can establish, the LPA has reviewed technical matters in the site assessment process, however the fact that they might have been taken into account is not the end of the matter as it is essential that those assessments are robust.

2.5 Our previous Regulation 19 stage representations (accompanied by a Turley Outline Landscape, Visual and Green Belt Advice Note) set out a series of concerns as to how the impact of development on the land promoted by Bellway had been overstated.

Q4. How did the Council consider the viability and deliverability of sites, especially where new supporting infrastructure is required?

2.6 No comment.

Q5. How did the Council take into account flood risk? Has the Plan applied a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property as required by paragraph 161 of the Framework?

2.7 No comment.

Q6. What are the reasons for the different affordable housing requirements between allocations in the Plan?

2.8 No comment.

Q7. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

2.9 Our concern relates to the manner in which the Strategic Housing and Economic Land Availability Assessment (CD3.77) site assessment sheets considered the following sites:

- Site Reference: 53 (Local Plan Allocation AL/RTW 19 (part site), overlaps with site 240

2.10 Page 45 of the site assessment sheets in relation to sites at RTW refers to this site having been assessed for “development potential, notably for residential use or recreation use.” The conclusion was that it should not be allocated for residential development, despite its location relative to the LBD, described as “Greenfield site comprising two parcels, one adjacent to LBD and the second within proximity of LBD.”

2.11 The assessment concluded that:

“The southern part of this site (Plot A) is considered to be suitable for enhanced sport and recreation uses and has a current planning permission for this use. The northern part of this site (Plot B) is not considered to be suitable due to the fact that it is part of a larger Green belt parcel that would cause very high harm if released from the Green Belt. It is also considered that there would be harm to the AONB, landscape and heritage constraints if Plot B were to be released. However the southern parcel (Plot A) is part of another Green Belt parcel, which if released would be considered to cause moderate harm. The southern site (Plot A) is considered to be suitable for the uses proposed above, namely sport and recreation uses.”

2.12 Plot A relates to the southern part of the land promoted by Bellway. As the draft Local Plan acknowledges, this area does benefit from planning permission granted in 2017 for recreational facilities. No submissions were ever made to discharge the conditions of that permission. Despite numerous objections and a lack of information, the LPA granted permission again in April 2021. Moreover, the land is subject to an option in favour of Bellway for a number of years and not subject to any arrangement with the Council for the uses it has permitted. The fact that this site and land to the north is subject to an agreement with a national housebuilder (who is promoting the site for residential development and recreation use) is clear indication that the allocation of Plot A for solely recreational purposes (as envisaged in Policy AL/RTW 19) is undeliverable without being facilitated through a comprehensive site development policy including an element of housing to the north.

2.13 Bellway also consider that the evidence from LUC overstates the contribution (and therefore harm) that releasing the are proposed for recreational purposes under allocation AL/RTW 19 makes to the Green Belt. This area forms part of parcel TW6a. The contribution of Parcel TW6a as a whole has been overstated, however as the Turley Outline Landscape, Visual and Green Belt Advice Note demonstrates, the southern part of the land promoted by Bellway makes a lesser contribution in its own right.

2.14 It appears as though Plot A of site 240 was assessed (and then proposed for allocation) on the basis of the fact that the Council had granted permission in 2017 and then again

in 2021 for recreational use. The Council does not appear to have considered whether the site might be suitable for other uses, such as those proposed by Bellway.

- 2.15 We also draw attention to concerns that the SHELAA assessment of Tudeley Village (site 447/448) appears to be based upon assumptions about what services and facilities the development could provide, rather than an objective assessment of the characteristics of this part of the Borough and without any consideration of the phasing or viability of providing services and facilities. As with the Local Plan, there is no explanation as to how the Tudeley Village site will be supported by public transport services to avoid the use of the private car.

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