

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 2: The Strategy for Royal
Tunbridge Wells and Southborough**
**Issue 2: Land at Colebrook House,
Royal Tunbridge Wells**

Document Reference: TWLP/120



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Matter 2 – The Strategy for Royal Tunbridge Wells and Southborough

Issue 2 – Land at Colebrook House, Royal Tunbridge Wells

Inspector’s Question 1: [How can Plan be modified]

Considering the conclusions reached in paragraphs 57-61 of the Inspector’s Initial Findings, how can the Plan be modified to rectify the soundness issues identified?

TWBC response to Question 1

Introduction

1. Following the examination and the Hearing Sessions, paragraphs 57-61 of the Inspectors Initial Findings letter ([ID 012](#)), set’s out the Inspectors concerns in relation to this site and the approach taken by the Council. In summary, the Inspector notes the following in regard to the site.
 - The SLP seeks to remove the land at Colebrook House from the Green Belt but does not allocate it for any specific use in the Plan, rather it is safeguarded for future economic development use.
 - Since the Hearing sessions, the Council’s position has changed and examination document TWLP/091 suggests that the site should remain in the Green Belt.
 - Paragraph 143 of the NPPF, allows for the safeguarding of land between the urban area and the Green Belt, in order to meet longer-term development needs, however this is only ‘where necessary’ and relates to longer-term needs stretching beyond the plan period.
 - The Council has recently granted consent for a large area of commercial floorspace on the adjacent site at Longfield Road, which, in itself almost meets the entire identified Local Plan employment floorspace need.

- Paragraph 143 of the NPPF also requires plans to define Green Belt boundaries clearly and the removal of Colebrook House and its grounds only from the GB would be considered to be arbitrary in the context of its wider surroundings and would not be readily recognisable.
 - The Inspector finds no exceptional circumstances to justify altering the Green Belt boundary in this location.
2. The Inspector is therefore clear at paragraph 61 in his letter that he finds no exceptional circumstances to justify altering the Green Belt boundary to remove the Colebrook House site in this location within this Local Plan.

The Site

3. Land at Colebrook House is located to the north of Royal Tunbridge Wells, adjacent to the A21 heading north to Tonbridge. The site includes a large vacant residential property, tennis court, swimming pool, parkland and woodland, with direct access to the A21. It lies within both the Green Belt and the AONB in immediate proximity to the designated Key Employment Area and the SLP [\(3.128\)](#) allocated employment site – AL/RTW 17 – Land adjacent to Longfield Road, Royal Tunbridge Wells, which is allocated for approximately 80,000 sqm (net) of mixed employment floorspace, including Use Class E - Commercial, B2 - General Industrial and B8 - Storage and Distribution, in the form of a business park.
4. The assessment of the site is set out within the Strategic Housing and Employment Land Availability Assessment [\(3.77n\)](#), pages 78-80). This concludes that the '*Site is not proposed for allocation in this Local Plan. It is to be removed from the Green Belt to provide the opportunity for possible employment use in the longer term*'.
5. Justification for the identification of the site and its removal from the Green Belt is also set out within the Development Strategy Topic Paper for the Pre-Submission Local Plan – Revised October 2021 [\(3.126\)](#) within Table 5 - Summary of proposed site allocation policies in the Local Plan that contain land currently within the Green Belt – RTW Safeguarded Land.
6. Consequently, Land at Colebrook House is identified within the Submission Local Plan (SLP) [\(3.128\)](#), as an area which should be safeguarded for future employment use. The Economic Development Topic Paper – March 2021 [\(3.84\)](#) provides the background and

context to this approach. This states at paragraphs 4.35-4.38, that; *“It is proposed that the site at Colebrooke House be identified as safeguarded land and be removed from the Green Belt in order to meet future employment land needs in this sustainable location, as a further extension of the Key Employment Area, should future employment provision be required over the longer term. This is seen as consistent with the NPPF insofar as it has regard to the likelihood of land being needed to meet longer term development needs”*.

Consideration

7. As referred to above, the site referred to as Land at Colebrook House is not allocated within the SLP [\(3.128\)](#) and therefore does not have a specific policy reference but is referred to within the supporting text of the Royal Tunbridge Wells section (Section 4) of the SLP [\(3.128\)](#). Paragraphs 5.15 – 5.17 of the Plan refer to it as *“a sustainable location next to a Key Employment Area, to contribute to continuing economic growth in the longer term beyond the plan period should this be required”*.
8. The site is also identified within Table 6 – Green Belt Sites, of the SLP [\(3.128\)](#), which provides detail of sites within the SLP [\(3.128\)](#) which are to be removed from the Green Belt.
9. The Council is clear in the SLP [\(3.128\)](#) that it considers that it is already seeking to plan positively in employment land terms by providing over the minimum requirement and therefore Land at Colebrook House does not warrant an allocation at this time but should be safeguarded for future employment use.
10. The Inspector did not ask any specific questions in relation to Land at Colebrook House in the MIQ’s from the Stage 1 and Stage 2 Hearings, although the site was discussed at a number of hearing sessions including: Matter 4: Principle of Green Belt Release, Issue 1: Principle of Green Belt Release [\(TWLP/018\)](#) on the 27 May 2022, Hearing Matter 2, Issue 3 – Employment Land Needs [\(TWLP/013\)](#), on the 25 May 2022 and then again in more detail under Hearing Matter 10, Issue 2 – Employment Site Allocations [\(TWLP/054\)](#) on the 7 July 2022, which was also attended by the agents promoting the site.
11. At these sessions, the Inspector raised concerns about the justification for removing this site from the Green Belt at this time due to the Plan’s already overprovision of employment land floorspace and in particular the adjacent SLP [\(3.128\)](#) employment site at Land adjacent to Longfield Road – Policy AL/RTW 17.

12. Following the hearing session and the Inspector's subsequent site visits, the Inspector sought a response from the Council through Local Plan Examination Action Point 24, regarding land ownership information relating to Colebrook House. Specifically, he sought a map detailing the land ownership of the site as an aid to better understand the site and surrounding areas. [Action Note 24 – TWLP/103](#) sets out the land ownership and includes a map at Appendix 1 detailing the land ownership of Colebrook House and the adjacent 'Land adjacent to Longfield Road site' as well as indicating relevant site designations including the Green Belt.
13. Additionally, the Council produced Action Point 12 – Green Belt Changes ([TWLP/091](#)), which details the changes that are proposed to be made to the Green Belt boundaries following the Hearing Sessions in 2022.
14. Section 5 of this Action Point sets out the following:
- Land at Colebrook House Pembury has no specific policy attached to it within the Submission Local Plan but is identified at paragraph 4.127 as land to be removed from the Green Belt and safeguarded for future economic use.
 - Following discussion at the Examination, the Council has concluded that as the site has been identified for the longer-term economic needs of the Borough but not sought for specific allocation at this time, that it cannot justify its removal from the Green Belt.
 - The Council proposes that the text at 4.127 in the SLP is amended to identify the site as suitable for meeting longer term future needs for economic development beyond the Plan period and subject to future review, but for this plan it is to be retained in the Green Belt.
15. Taking the above into account and the consideration set out within [Action Point 12](#) - the Council agrees with the Inspectors conclusions. Therefore, the Council is proposing to make main modifications to the Local Plan to reflect this approach and subsequently retain this land within the Green Belt and amend the reference to the safeguarding of this site for future employment land use. Amended wording is proposed and will be consulted on as part of the main modifications stage. Suggested wording is included at **Appendix 1** of this statement. Additionally, this requires a mapping change, to re-instate the Green Belt designation for this site on the Local Plan Policies map.

16. The Council is aware, through submissions to the 'Consultation on Councils Response to Inspectors Initial Findings' and through discussions with the promoters of the site, that they are now promoting the site for alternative uses – primarily commercial leisure use. Whilst it has been acknowledged by the Council in earlier stages of the preparation of the SLP that the development of the site in the future would contribute to meeting employment needs, it is not clear at this stage how a potential leisure use would contribute to meeting employment or leisure needs in the borough. Consequently, without review of further evidence about what a commercial leisure site may deliver, it is not considered appropriate or justified to amend the Plan in light of this further submission at this stage.
17. Should the site promoter wish to pursue an alternative use for the site, this is best considered through the Local Plan review. This would require the site to be submitted and considered through the Strategic Housing and Employment Land Availability Assessment and the Sustainability Appraisal process for the use proposed and consideration of any other alternative sites. It could also be considered through the Development Management process if it was brought forward in advance of the Local Plan Review.

Conclusion

18. Taking the above into account and in accordance with Paragraph 61 of the Inspectors Initial Findings letter ([ID_012](#)) , the Council is proposing to remove reference to Colebrook House as a safeguarded site for future employment floorspace needs.
19. Amended wording to this effect is included within **Appendix 1** of this statement and will be the subject of Main Modifications consultation.

Appendices

Appendix 1: Proposed amended text

Submission Local Plan

Section 4: The Development Strategy and Strategic Policies

The Borough's Green Belt

Table 6 – Green Belt Sites

Policy Number	Site Address	Status	Size (ha)	% of MGB
RTW Safeguarded Land	Land at Colebrook House, Pembury Road	Removed	-9.291	0.130

Section 5: Place Shaping Policies

Royal Tunbridge Wells

- 5.7 In terms of employment provision, it is recognised that the North Farm/Longfield Road area has developed and evolved over recent years to offer a broad range of uses, not just traditional employment (Class E Commercial, Business and Services, (previously B1)/B2 General Industry and /B8 Storage and Distribution Uses); it is therefore important for the Council to be clear on the future strategy and mix of uses that will be appropriate in this area over the course of the plan period, not only to support and protect the existing employment uses within this area, but also to protect the role and function of the town centre.
- 5.8 In addition to the above proposed allocation, an adjoining site (Land at Colebrooke House) has been considered as an employment allocation, for sensitive development within a parkland setting. This site also falls within the Green Belt and the High Weald AONB. Given that the Local Plan is already seeking to plan positively in employment land terms by providing over the minimum requirement, it is not considered to warrant allocation in this Local Plan and should not be allocated or removed from the Green Belt at this time. However, the site could be considered through the review of the Local Plan, for meeting longer term employment land needs. ~~However, in order to enable this site, in a sustainable location next to a Key Employment Area, to contribute to continuing economic growth in the longer term beyond the plan period should this be required, it is nonetheless removed from the Green Belt. This is in line with ensuring the long term permanence of the new Green belt boundary. Planning permission for the permanent development of this land will only be granted following a future review of this Local Plan and be subject to further assessment of employment land needs at that time.~~

5.9 The Council is keen that this area continues to provide a location for a mix of employment-generating uses, to include the traditional business and commercial uses, as well as other leisure uses where appropriate, and policies within this Plan set the framework for this. A significant site is proposed to be allocated to provide modern,

purpose-built employment floorspace in a prestigious business park setting to deliver in the region of 80,000sqm of additional office E(g)(iii), B2, and B8 floorspace. This site, at Land adjacent to Longfield Road (Policy AL/RTW 17), already benefits from planning permission granted and will help to further establish this area as a key business location, not only for Royal Tunbridge Wells, but the wider borough and west Kent.

This proposed amendment also requires a mapping change, to re-instate the Green Belt designation for this site on the Local Plan Policies map.