



Phase 2

Tunbridge Wells Borough Council

Local Plan Examination in Public

Hearing Position Statement - Matter 5 Site Selection Methodology

Submitted on Behalf of Rosconn Strategic Land Ltd

March 2022

Our Ref: C22026

Phase 2 PLANNING & DEVELOPMENT LIMITED

270 Avenue West | Skyline 120 | Great Notley | Braintree | Essex | CM77 7AA | 01376 329059 | www.phase2planning.co.uk

Quality Assurance

Site Name: Land south of Benchley Road, Horsmonden
Client Name: Rosconn Strategic Land Ltd
Type of Report: Representations to the Examination in Public

Author	Initials	Date
Lisa Skinner BSc(Hons) MA DipMgt MRTPI Director	LS	March 2022

Reviewed	Initials	Date
Samantha Stephenson BA (HONS), MScTP, MRTPI Principal Planner	SS	March 2022



Contents

1. Introduction	1
2. Matter 5 – Site Selection Methodology	2

1. Introduction

- 1.1 This Statement has been prepared on behalf of our client, Rosconn Strategic Land Ltd who has a promotion agreement with the landowner on 3.6 ha of land to the south of Brenchley Road and west of Fromandez Drive, Horsmonden, Kent.
- 1.2 The site has been promoted through the emerging Local Plan process and is now identified as a draft allocation within the Tunbridge Wells Borough Submission Local Plan 2020-2038 (Submitted October 2021), hereafter referenced as “The Plan”. The site is identified as Draft Policy AL/HO2 for residential development providing approximately 80-100 dwellings, a replacement village hall and associated parking.
- 1.3 In this submission, we respond specifically to Matter 5 - Site Selection Methodology that covers the following:

Issue 1 – Site Selection Methodology

2. Response to the Inspector's Questions

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

- 2.1 The SA, October 2021, of the Plan details the process of how sites were considered for allocation along with other supporting evidence that has informed the Plan.
- 2.2 We believe the Council has carried out a robust assessment of sites along with appropriate criteria taken into account. The evidence base for potential sites has included the details within the Strategic Housing and Economic Land Availability Assessments (SHELLA) and further assessments as detailed in the SA. The SA considered reasonable alternatives and part of the filtering process led to the dismissal of sites that were poorly related to existing settlements or had significant environmental concerns. This led to approximately 300 sites being considered for further assessment. The SA confirms that whilst individual sites were recommended for allocation, a further assessment was made in relation to the potential cumulative impact for each parish or settlement location. This initial high-level assessment has then been followed up in more detail by various other supporting evidence including The Settlement Role and Function Study, February 2021, (SRFSU), (reissued in October 2021 with corrections). The Council has ensured the evidence base is also up to date and considered sites that were submitted late in the process or reassessed sites if further information has come forward. The Council has also emphasised that just because a site scored highly in the SA, it was not automatically allocated for development as other factors were considered such as housing need, the views of Parish and Town Councils and the community.
- 2.3 We believe the approach within the SA has not only provided a robust selection process but also considered the cumulative impacts of potential development. There is clearly a difficult balance for the Council to make in a highly constrained rural area. We agree with the Council that the current proposals would lead to significant beneficial effects in terms economic and social sustainability objectives whilst limiting as best as possible the environmental impacts associated with new development.
- 2.4 In the case of Horsmonden, where three sites have been recommendation for allocation, we believe the Council has robustly assessed whether the settlement is suitable for development and that the cumulative impact of the three draft allocated sites is appropriate as justified in the evidence base at Appendix P of the SA, page 451.
- 2.5 We therefore fully support the approach taken by the Council that seeks to ensure the principles of sustainable development are met as detailed in the NPPF.

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

- 2.6 The SA on page 146, paragraph 8.1.5 sets down the assumptions that have been made in relation to dwelling capacity and includes the following statements:

“Generally, a yield of 30 units per hectare was applied. A high-level indicative yield was taken, calculated using 30 units per developable hectare based on the extent of the site area minus any ‘level 1’ constraints which are defined as constraints that would preclude most forms of built development for example ancient woodland, Sites of Special Scientific Interest (SSSI) and Flood Zone 3;”

“There were exceptions to this rule including on larger sites for example. It was recognised that some sites would require land-take for the provision of open space and landscape buffers. In such instances, a high-level judgement has been made which has informed the sustainability assessment of the site”

- 2.7 Whilst we do not object to the general yield of 30 dwellings per hectare, we do object to the manner the developable area has been considered and then used to define the built area and the other allocated areas in the draft allocation maps. Whilst the Council acknowledges these matters are at a high level, they have then filtered through into definitive lines on a map.

- 2.8 In respect of the Inset Map 26 for Horsmonden, we are concerned at the use of the red line that delineates the alteration to the limits for built development and the dark blue line that indicates the site allocation boundary. In addition, further designations are shown on the Map for allocation AL/HO2 that include community use and open space and landscape buffers. These designations are a result of high level assessments that are not informed by detailed technical reports. The lines drawn could frustrate good design and restrict the approach to development across the site. The red built development line is therefore not considered to be effective and should be extended to cover the entire site allocation. This is also pertinent as the open recreational buffer zones may involve operational works along with the potential for play areas etc. In the case of the community use designation, a low narrow zone may not be the most appropriate effective use of the land. Flexibility is therefore important to ensure the optimum use of the land.

- 2.9 In our Pre-Submission Representation in relation to Policy AL/HO2 in relation to criterion 6 we stated that in order to meet the lower yield figure of 80 on draft allocation AL/HO2 the Council’s approach would lead to a density of 46 dwellings per hectare which is not considered appropriate in an edge of settlement location. A balance needs to be struck between ensuring an effective use of the land that responds to the character of the area. In addition, the allocation for AL/HO2 includes a significant area of land for the community hall but we are unsure as to how the land take has been considered. To ensure an optimum use of the site, further information and technical evidence would normally be available to ensure the most

appropriate development comes forward. We believe the current position would frustrate and restrict development unnecessarily.

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.

2.10 The SA has clearly referenced how these matters have been taken into account during the draft allocation process and we believe the process has been comprehensive and fully support the overall approach.

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

Our client has considered the viability and delivery of AL/HO2 and is committed to providing 40% affordable housing on site and the provision of land for the new village hall. However, it is essential that the overall costs for building the new village hall is met from all the new development coming forward in Horsmonden to mitigate the impact on community provision. This would be consistent with the approach the Council has taken to date in respect of planning permission for 49 dwellings, 18/01976/FULL, at Gibbet Lane/Furnace Lane that sought a financial contribution to this provision. The new village hall is also referenced on page 157 of the Infrastructure Delivery Plan, October 2021.

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?

2.11 No comment.

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

2.12 No comment.

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

2.13 See answer to Question 1.



Phase 2

PLANNING &
DEVELOPMENT
LIMITED