

## **Examination of the Tunbridge Wells Borough Local Plan – Stage 2**

### **Matter 14, Issue 5 – Ensuring Comprehensive Development**

This statement is submitted on behalf of Mr and Mrs Whetstone for purposes of the Examination of the Tunbridge Wells Borough Local Plan. It responds Matter 14, Issue 5, Question 1 – Ensuring Comprehensive Development.

#### **Question 1: What is the Justification for Policy STR 4 and will it be effective in ensuring comprehensive development?**

Policy STR 4 does not properly address the work involved to ensure the comprehensive development of the strategic sites. Instead of providing a mechanism now for ensuring land owner collaboration and a comprehensive approach to development for the urban expansion of Paddock Wood (including land at east Capel) and the new garden settlement at Tudeley Village, the policy as drafted defers this work to a later stage in the development process (i.e. in a Supplementary Planning Document). SPDs fall outside the examination process and are not, therefore, subject to full public scrutiny and the rigours of the examination.

It is all well and good with Policy STR4 saying that strategic development will be “comprehensive” “holistic” and “fully integrated” but if the site boundaries for the strategic sites remain “provisional” and have not been fixed, this cannot be achieved. All landowning parties must know the extent of the site upfront. Otherwise, there exists the real possibility that the larger landowning and developer communities will work to their own agendas at the SPD stage to the detriment of the wider comprehensive master planning approach.

In particular, we have real concerns that our client’s site (Tudeley Brook Farm) is being marginalised to the detriment of the overall planned vision and interests of acknowledged importance at Paddock Wood including: amenity provision and open space, blue/green infrastructure, connectivity and biodiversity. These are all key and central planks of the overall masterplan/policy vision.

Policy STR 4 as currently drafted does not ensure that the strategic sites will be brought forward in a comprehensive way. In order to be found sound, reference needs to be made in the policy now to a fixed land boundary in order to ensure that place shaping and a good quality environment such as green space corridors, open spaces, pedestrian/cycle linkages, flood mitigation land are all properly planned for.

Indicative land boundaries are already proposed for the urban expansion of Paddock Wood (including land at east Capel) in the form of (Inset Map 4), Map 27 (Masterplan Areas) and Map 28 (Structure Plan). In the interests of good planning and contributing to the achievement of sustainable development we have asked elsewhere in our representations that the overall site boundaries for Paddock Wood are fixed now and made permanent in the Local Plan.

With this change, Policy STR 4 can then refer to the importance of achieving comprehensive development across the whole of the urban expansion of Paddock Wood (as fixed in the boundaries set in Inset Map 4, Map 27 and Map 28) rather than placing a reliance on the SPD stage and agreeing site boundaries then.

We therefore recommend altering the wording in Policy STR 4 to read:

“To ensure holistic and fully integrated approaches to the strategic developments proposed in this Local Plan, masterplans for the urban expansion of Paddock Wood (including land at East Capel) and Tudeley Village, will take the form of Supplementary Planning Documents. ***For the urban expansion of Paddock Wood (including land at East Capel) these SPDs will relate to the overall areas of planned growth fixed in Inset Map 4, Map 27 and Map 28***”.

As things stand, there is no agreement between the various landowners within Paddock Wood/ East Capel strategic site. All of the land within this allocation is fundamental to achieving sustainable development. Regrettably, the Council (TWBC) and Crest Nicholson (Crest) have made it explicitly clear in the Statement of Common Ground (SoCG) between TWBC and Crest that Crest will “*submit a planning application for the land within its control only*” (paragraph 2.16 of the SoGC). Based on the information provided in the SoCG, it appears that piecemeal development is already underway, with Crest already looking to develop the western parcel of land on its own, without the involvement of any other landowners (such as our Client’s site at Tudeley Brook Farm).



This is concerning not only for our client, but also in so far as it directly contradicts the advice given in Chapter 3 of the NPPF which states that the planning system should be “genuinely plan-led”. It is therefore imperative that the wording of Policy STR 4 is changed in order for it to accord with national planning policy and for it to be effective in ensuring comprehensive development.

