



# The countryside charity

Kent

## Matter 7 – Residential Site Allocations

Issue 1 – Royal Tunbridge Wells and Southborough

AL/RTW5 – Land South of Speldhurst Road and West of Reynolds Lane

*Q27. How has the scale of proposed development been determined and is it appropriate and justified in this location?*

Neither the allocation policy in the Plan nor the SHELAA for this site identifies the size of the developable area or the housing density applied. However, we note that Site 100, which forms part of the residential use area in the allocation, was assessed for development at 20dph and 30dph.

These densities are very low and fall below the expectations set out in the National Model Design Code and in TWBC's own. In view of highly sustainable location of this site and its proposed removal from the Green Belt and inclusion in the RTW LBD, it is difficult to understand how the Council's stated aim of optimising density (to minimise loss of green fields) has been applied in determining the scale of this allocation.

CPRE continues to believe that this allocation is not justified. At the time of the Regulation 18 consultation, the current allocation was not assessed, however Site 100 and the adjoining Site 30, (Caenwood Farm) were both recorded as unsuitable as potential site allocations due to the "sensitive biodiversity, heritage and landscape features" (CD\_3.22n SHELAA Royal Tunbridge Wells Site Assessment Sheets). Nothing has intrinsically changed about the now-allocated site between that time and Pre-Submission Plan, but the sustainable location appears to have outweighed these concerns. As highlighted in our Pre-Submission Local Plan response, this late change meant that there was no opportunity for public consultation on the change in policy, which remains unexplained.

Should Policy AL/RTW5 be retained, however, we suggest that the number of homes be significantly reduced and built at a density reflecting the urban grain of the existing housing on the opposite side of Speldhurst Road (and the Southborough streets that lead from it), within part of the area currently reserved for residential development. This would, at a stroke, reduce the amount of Green Belt needing to be released, reduce the traffic impacts on Speldhurst Road and the nearby A26 AQMA, and encourage the delivery of homes that meet local need and are affordable for local people.

*Q28. What is the site boundary based on? Is it sufficiently clear to users of the Plan where residential development is expected to be located?*

It appears that the site is bounded on the western and part of the southern side by the Public Right of Way that links Speldhurst Road to Reynolds Lane; it is unclear whether this PRoW, and the trees on either side of it, are included in the allocation. This PRoW is a valued leisure space for existing local residents and the proposed residential development will reduce its seclusion and serenity.

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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*Q29. Is it necessary to widen Speldhurst Road in order to facilitate the proposed development? Is it sufficiently clear to users of the Plan what highway improvement works are required?*

Housing opposite this site - Victorian terraces with small/steeply sloping front gardens - generally does not have parking available. This results in unavoidable parking at the roadside on Speldhurst Road, as the alternative Victorian side roads off Speldhurst Road are already similarly congested with resident parking. It is not clear what highway management works are proposed or indeed possible along this section of Speldhurst Road. The road already suffers congestion, particularly approaching the junction with Reynolds Lane, where there are turning conflicts in both directions which worsens the congestion. The proposed additional estate road will exacerbate these existing problems.

*Q30. Will it be possible to widen Speldhurst Road and retain trees along the site frontage?*

It is clearly impossible to widen the carriageway of Speldhurst Road alongside this site without removing all the trees along the site frontage. One of the factors assumed in justifying the proposed allocation at AL/RTW5 was that the existing dense tree cover would mask and mitigate the effects of any building at the site.

*Q31. Do exceptional circumstances exist to alter the Green Belt boundary in this location, having particular regard to paragraphs 140 – 143 of the Framework?*

CPRE Kent is of the opinion that exceptional circumstances do not exist to alter the Green Belt boundary at this location.

Since the Submission Plan was published, other reasonable alternatives have begun to emerge within the LBD of the existing Main Urban Area of Royal Tunbridge Wells and Southborough. For example, new plans for the redundant Cinema Site would bring forward some 40-50 additional dwellings relative to the number proposed under previous development schemes; and 40-45 dwellings are now proposed on the site of the existing Logistics UK site on St John's Road - these alone almost make up the shortfall that would result from deleting AL/RTW 5.

There will be new opportunities to optimise density of development on some other likely development sites in the town centre, including at Torrington and a likely remodelling of the RVP shopping mall under the proposed Town Centre Area Plan which is now under development as part of the proposed Local Plan. In conclusion, the proposed harm to the Green Belt at the site is not outweighed by sufficient other benefits from development at this site rather than within the existing urban area.

We additionally note that the Policy for this allocation does not include a specific requirement for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt, as required by the NPPF. The Policy overview states that the Development Strategy Topic Paper and Green Belt Studies set out the exceptional circumstances and compensatory improvements to the remaining Green Belt to justify changes to the boundary in this location (paragraph 5.49). Unfortunately, the Development Strategy Topic Paper only says that "*Policies are included in the Local Plan to ensure that such improvements are delivered*" (CD\_3.126 paragraph 6.207).

AL/RTW16 – Land West of Eridge Road and Spratsbrook Farm

*Q10. What is the site boundary based on? What is the justification for only allocating the eastern 'half' of the site for residential development?*

CPRE understands that the justification for only allocating the eastern part of the site is based on further investigation by TWBC and recent ministerial statements on preserving the AONB, leading to a decision to continue to protect the AONB area constituted by the western half of the site which was previously included for development under the Regulation 18 proposals. (CD\_3.126 Development Strategy Topic Paper, CD\_3.96b LVIA Section 6.3 RTW sites).

*Q13. Do exceptional circumstances exist to alter the Green Belt boundary in this location, having particular regard to paragraphs 140 – 143 of the Framework?*

CPRE does not believe that exceptional circumstances have been made in relation to the need for proposed allocation AL/RTW 16. Since the Submission Plan was published, other reasonable alternatives have begun to emerge within the LBD in the existing urban area. It should be possible to substantially increase the density at other sites, to allow a greater number of dwellings, as has been demonstrated at 1887 The Pantiles. This would make up the shortfall that would arise by deleting the AL/RTW16 allocation. Further reasonable alternatives are likely to arise under the Town Centre Area Plan now under development.

*Q14. What potential impacts will the allocation have on the setting of the High Weald AONB?*

The allocation would have a negative impact on the setting of the High Weald AONB. It is difficult to envisage how satisfactory mitigation could be provided on most of the southern boundary of the site which falls away to the south.

*Q15. Why is it necessary to provide additional landscaping along the south-west boundary to 'protect the amenity of the adjacent farmhouse'?*

The farmhouse is part of the setting to the AONB to the west and the additional landscaping is needed to assist in mitigating harm to the AONB constituted by the proposed new development.