
EXAMINATION STATEMENT - MATTER 07 - ISSUE 10

Matter 07 - Issue 10 - Residential Site Allocations

Tunbridge Wells Local Plan

Representations on behalf of
Clarendon Homes

June 2022

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TUNBRIDGE WELLS LOCAL PLAN
REPRESENTATIONS ON BEHALF OF:
CLARENDON HOMES

JUNE 2022

Project Ref:	30839/A5/DM
Status:	Draft
Issue/Rev:	01
Date:	June 2022
Prepared by:	ST
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Ref: 30839/A5/DM
Date: June 2022

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore now Stantec on behalf of Clarendon Homes. It regards the land interests of Clarendon at "Land at Maidstone Road, Matfield" – an allocated site of up to 15no. dwellings (Policy AL/BM2) in the emerging Tunbridge Wells Local Plan.
- 1.2 James Chapman of Clarendon will be appearing at the Examination session regarding the site (I.e., Matter 07 – Issue 10).
- 1.3 The site is "suitable", "available", "achievable" and "deliverable", and is presently the subject of pending outline planning proposals (ref. 22/00757/OUT). The outline proposals seek to meet the requirements of the emerging policy by providing up to 15no. dwellings including affordable housing provision (40%), open and children's play space, additional parking, SUDS provision and access on to Maidstone Road.
- 1.4 As above, the proposals are presently pending consideration, and the applicant is working through and providing a response to specific matters raised by consultees. A further/detailed update can be provided to the Inspector at the Examination session.

2.0 RESPONSE TO MATTER 07: RESIDENTIAL SITE ALLOCATIONS

ISSUE 10

AL/BM2 – Land at Maidstone Road, Matfield

Q.3 How has the proposed area of residential development been established? What is it based on and is it justified?

- 2.1 Clarendon broadly supports the site allocation, however the indicative plan (Map 56) accompanying the policy requires amending. The red line boundary of the proposed allocation amounts to circa 1.65 hectares. The attached Constraints Plan (**Appendix 1**) shows how the western half of the land (0.85 ha) is affected by a covenant preventing the construction of buildings, however a children’s play space, roads and parking can be located within this part of the site without breaching the covenant.
- 2.2 Clarendon suggests amending the area of residential, as coloured “yellow” on Map 56 of the Local Plan to reflect the developable area on the Proposed Allocation Plan (**Appendix 2**). The developable area amounts to 0.8 hectares, which, when even considered on its own, provides a density range of 14.75 to 18.75 dph (11-15 units) which is in line with the draft allocation and still on the low side when compared to other allocated sites within the AONB.
- 2.3 From the evidence base, Clarendon has been unable to ascertain the necessity for the subject area to be provided for open space/landscape. The subject area does contain an extent of existing vegetation including trees. However, within the tree survey carried out by Clarendon (**Appendix 3**), the group of trees at this location (ref. G003) have been identified as “Category C1” trees – trees of a moderate quality and ultimately not required to be retained.
- 2.4 Clarendon suggests amending the area of the “Open Space and Landscape Buffer” (coloured “green”) to match that shown on its Proposed Allocation Plan (**Appendix 2**).
- 2.5 Clarendon agrees with the area highlighted purple for “community use” and suggests this area also accommodates the “children’s play space”. Indeed, significant discussions have taken place with the Parish Council and Matfield Village Hall Management Committee and there is broad support for this approach.

- 2.6 Clarendon notes the indicative access on Map 56 and highlights that the access point may be anywhere along the boundary with Maidstone Road. Discussions are ongoing with KCC Highways and TWBC, with the unified view that the access shall be positioned in the most appropriate place, accounting for adequate visibility splays and minimising tree loss.

Q.4 Does the site allocation AL/BM2 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?

- 2.7 For the purposes of the NPPF (footnote 60), whether a proposal is “major development” is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.
- 2.8 Having regard to these considerations, the proposed development is not considered to represent “major development” in the AONB. Accordingly, para 177 does not need to be applied in the consideration of the proposals.
- 2.9 This is because the proposals are for 15no. new dwellings on a small site – slightly over 1.65ha. The site proposals are accordingly considered to represent a limited and proportional extension to the Matfield and Brenchley area which currently comprises c. 1,100 homes.
- 2.10 Furthermore, the development of the site would not have a significant adverse impact on the wider AONB given its strong enclosure from the wider countryside to the south and west. The development will have a more direct functional relationship with the built form along Maidstone Road (east) and to Matfield (north).
- 2.11 Due to the limited extent of proposed proportional growth at this extent of Matfield and the small-scale nature of the development proposed, it is not considered to lead to major development within the AONB. The allocation is sound and justified in accordance with the NPPF.

Potential impacts of development

- 2.12 The potential impacts of development on the character and appearance of the area are to be fundamentally drawn out/determined at the planning application stage when the precise nature and scope of development is better known.

- 2.13 Nonetheless, the allocation has been informed by the round of evidence base documents. This includes work on, *inter-alia*, the SHELAA (CD3.77d), Grassland Assessment of Sites in High Weald AONB (CD3.97a), and Historic Landscape Characterisation (CD3.38d).
- 2.14 It will be for the Council to present its work on the site allocation process, however, the policy requirements for the site have been broadly informed by the evidence base. In this light, the application material submitted by Clarendon includes assessments on design, character, heritage, landscape and impacts upon the wider AONB. These aspects are thus being considered by the Council at the outline stage. Further details will emerge at the reserved matters stage(s) to ensure that the development will have sensitive impacts upon the character and appearance of the area.

Q.5 What is the justification for requiring additional car parking for the village hall?

- 2.15 The justification for additional parking is unknown. Requests have been made for the evidence base, but nothing has yet been received. Clarendon is committed to provide additional parking if it is necessary. It will be for the authority to provide the justification.
- 2.16 Criterion no. 6 of the policy requires parking to be provided in the area coloured purple. Clarendon agrees with the proposed location.

Q.6 How will the pedestrian access to the site be achieved?

- 2.16 Criterion no. 2 of the policy requires the provision of pedestrian access to Maidstone Road, including assessment and provision of crossing points. An access solution on to Maidstone Road has been submitted as part of the Transport Statement for the pending proposals. Further work is being undertaken on this following comments and queries recently received from the County Highways Authority.
- 2.17 The access proposals will include pedestrian access to the site including potential for an additional footway on the western side of Maidstone Road and/or a pedestrian crossing to the eastern part of Maidstone Road (where a footway is available). The proposals are to be the subject of further work including discussions and considerations by the County

Highways Authority. Clarendon can provide a further update on this at the Examination session.

Q.7 Is the site deliverable, having particular regard to land ownership?

- 2.17 Yes – the site comes under a single landownership and an option agreement is in place with Clarendon Homes.
- 2.18 Clarendon Homes has submitted an Outline application with an indicative layout to show how a scheme of 15 units can be achieved on the area of the site not constrained by the existing covenant. Given that the proposed density is just 12.29 dph, it is clear there is ample room for any number of different layouts to work within the proposed policy range.
- 2.19 Clarendon is seeking to deliver the scheme for the site following outline consent as well as subsequent reserved matters. Clarendon anticipates commencement to occur on site in Spring 2023.

APPENDIX 1

Constraints Plan (Clarendon Homes)

APPENDIX 2

Proposed Allocation Plan (Clarendon Homes)

APPENDIX 3

Tree Survey (Clarendon Homes)