

Examination of the Tunbridge Wells Borough Local Plan – Stage 2 - May to July 2022

Hearing Statement by **Mr PETER AVGHERINOS** on **Matter 7** of the Inspector’s “**Matters, Issues and Questions for Stage 2 – Revised**”.

I have made earlier representations in the Local Plan consultation process at Stages 18 and 19, including expressing concerns about the proposed management of the Green Belt, and the proposed development of site AL/RTW5.

Matter 7 – Residential Site Allocations

Issue 1 Royal Tunbridge Wells and Southborough

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

Questions 27 and 28.

The scale of the development has been determined by identifying the largest developable area that the Landscape Consultants would approve for release from the Green Belt at this location. To obtain that approval, a binary land allocation has had to be made. The developable area is abutted by a partially wooded landscaped area, to be created within the retained Green Belt land along its boundary with the development land. This buffer is to give the required feel of separation of the Green Belt land from the housing development. It also offers a recreational space. Regrettably it is also adjacent to an ancient woodland.

Questions 29 and 30.

Widening of Speldhurst Road appears unavoidable to provide site access. As well as more motor traffic, there will be many new pedestrians and cyclists. A pavement to the south of the road will be needed, with a well-drained road gutter to avoid splashing; this is an area that ponds easily and frequently. The loss of parking spaces will be a severe problem for the adjacent Southborough residents, and new spaces will need to be found for them.

Much of the highly valued woodland along Speldhurst Road, with its protected trees, will inevitably be lost.

Question 31.

At the present time there are no exceptional circumstances that justify altering the Green Belt boundary at this location.

The need for the 100 or so houses proposed is unproven. TWBC figures now show they can meet their own housing needs without it. Whether there are any exceptional circumstances in the neighbouring Boroughs that require their housing needs be met from this site has not been properly examined; but on the evidence currently available that is highly unlikely.

Developers are clearly keen to remove protection from this piece of land to open the way for unravelling the remaining Green Belt buffer between Royal Tunbridge Wells and Southborough. They may be offering attractive financial benefits to encourage this. The costs in terms of environmental damage, traffic congestion, air pollution, lost biodiversity, and so on, to the residents of the adjacent areas cannot be compensated in this way. The A26 corridor and its junction with Speldhurst Road are highly sensitive to any event disrupting traffic flow. This feature may not be adequately reproduced by numerical modelling.

This site should never have reached this stage of the Plan.

Meanwhile, approached in a different way, the site AL/RTW5 and the land beyond could become a wonderful asset for the future Tunbridge Wells by opening up an extensive Green Space, ideal for a Country Park. The need for further open space will be considered elsewhere in the examination, but it is clear that the population and occupation density of the TBW metropolitan areas are bound to increase over the Plan period. If the need for new recreational space is confirmed, then the Green Belt lands to the west of Tunbridge Wells are ideally placed to provide this. The mental, physical and social benefits of a Country Park here would be immense.

In conclusion, Site AL/RTW5 should not be allocated for development as proposed in the current plan. At most it might be classified as a provisional "Broad location for Growth", as has been done by other Boroughs. This would allow potential stakeholders in the area the opportunity to assess the feasibility of incorporating it into a Country Park or similar; perhaps with some housing included as a means of finance, for the betterment of Royal Tunbridge Wells, Southborough, and the wider Borough.