Examination of the Tunbridge Wells Local Plan

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Dear Mr Hone,

1. Thank you for your letter dated 22 December 2022 setting out the Council's response to my initial findings on the soundness of the Plan. The response is thorough and helpful in agreeing the main issues. However, to assist myself and others following the examination, I would be grateful if the Council could clarify how it proposes to overcome the issues identified, the scope of any additional work required and the timescales going forward.

Green Belt Assessment and Development Strategy

2. It is accepted by the Council that, in order to justify the proposed changes to the Green Belt boundary, a comparative assessment of other reasonable alternative options needs to be carried out. It is my understanding that this work is now in progress, with an anticipated completion date of late March 2023. As you correctly point out, the Council will then need to review the relevant site assessments and Sustainability Appraisal. Moving forward it would be helpful if the outcomes of this work can be presented in an updated Housing and Development Strategy Topic Paper.

Strategy for Tudeley Village and Paddock Wood

3. In my initial findings I identified concerns regarding the accessibility of Tudeley Village by sustainable modes of transport, the ability to successfully mitigate against serious impacts on the highway network, the suitability and deliverability of the necessary Five Oak Green bypass and the ability of the site to deliver housing at the rate and scale envisaged by the Plan. Combined with the lack of comparative assessment of Green Belt harm against other reasonable alternatives, exceptional circumstances did not exist to justify removing the strategic site from the Green Belt.

- 4. To progress the examination three possible ways forward were identified. They include 1) deleting the site, 2) modifying the Plan by making significant changes to overcome the identified soundness issues or 3) seeking to justify the allocation as submitted.
- 5. In your letter you refer to dialogue with bus operators, Kent County Council and Tonbridge & Malling Borough Council regarding possible sustainable transport solutions. You also state that the Council is "re-engaging with Network Rail" on the feasibility of a new train station. As far as the bypass is concerned, the letter also states that consultants have been instructed to assess various technical matters, from design to road safety and air quality. In addition, it is accepted that an assessment of the visual impacts of new infrastructure on the High Weald AONB will be necessary.
- 6. It is appreciated that the Council will need time to carefully think about the most appropriate way forward, and that these decisions will need to be informed by an objective analysis of the main issues. However, it would be helpful at this stage to understand the full scope and rationale of additional work that has been commissioned, indicative dates for its completion and the process (including timescales) for progressing the examination thereafter. The reason for seeking this clarification is twofold. Firstly, to inform participants by setting out a clear timetable for the months ahead, and secondly, to minimise any abortive or unnecessary work.
- 7. The same situation applies to Paddock Wood, where you have advised that further work is necessary to overcome concerns with flood risk and the provision of infrastructure, notably secondary school education. Consideration will also need to be given to any consequential impacts and/or need for further information in light of decisions taken at Tudeley Village.

Next Steps

- 8. In order to avoid any significant delays, I would be grateful if the Council could answer the queries above and produce an indicative timetable for progressing the examination, highlighting any significant milestones, no later than **Friday 17 February**. Should this not be possible please can you contact me through the Programme Officer at your earliest convenience to agree an alternative date?
- 9. I have asked the Programme Officer to upload a copy of this letter to the website for those following the examination, but I am not seeking any representations or correspondence on the suggested ways forward at this stage.

Yours sincerely,

Matthew Birkinshaw

Inspector