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**Tunbridge Wells – Local Plan Examination**  
**Inspector’s Matters, Issues and Questions – Stage 3**  
**Matter Statement by Dandara South East Ltd**  
**Matter 4 – The Strategy for Paddock Wood**

**Background**

This Matter Statement is submitted by Dandara South East Ltd (DSE). DSE is promoting land at Badsell Manor Farm, forming parcels within the strategic sites masterplan at “South-West” Paddock Wood (ref. SS/STR 1(B)).

**Matter 4 – The Strategy for Paddock Wood**

Issues 1 - 6 of the Inspector’s MIQs relate to strategic matters governing the growth strategy for Paddock Wood. These issues will be addressed directly by the Council and relate to the sequential test, education, sports and leisure provision and employment land. Where infrastructure obligations are required, these can be appropriately worked through the Section 106 process on individual applications. As such, this Matter Statement focuses on Issues 7 and 8 – the policy requirements and masterplanning for Paddock Wood, and the exceptional circumstances to alter the Green Belt boundary in this location.

**Issue 7 – Policy Requirements / Masterplanning**

***Q1. Do the suggested changes adequately address the issues identified in the Inspector’s Initial Findings? If not, what changes are necessary to make the Plan sound?***

***Q2. Is the suggested policy wording justified and effective?***

The response to the above questions is intertwined and is therefore set out below. Our response focuses specifically on the policy requirements for South West Paddock Wood (Policy SS/STR1(B)).

**Criterion iii)** – The criterion seeks 4.54 hectares of land for sport and leisure provision. As derived from the David Lock Associates Land Use Budget Plan (ref. TWBC04-009 C), the sports and leisure provision (parcel – SPP1) extends across both South West Paddock Wood (SS/STR1(B)) and North West Paddock Wood (SS/STR1(A)). The policy as presently worded implies that the entire sports provision is being provided solely in South West Paddock Wood, whereas it predominantly falls within North West Paddock Wood. It is thus requested that the policy is amended to address this.

**Criterion xii)** – This criterion seeks drainage measures including use of SUDS and connection to wastewater treatment facilities. Dandara supports these requirements.

The criterion goes on to seek the provision of flood attenuation features “to enable the delivery of flood betterment to the north western area of the existing settlement”. Dandara has undertaken initial flood modelling for the site. The early results of this have demonstrated that the scheme will be able to achieve drainage levels at greenfield rates to the required 1 in 100-year flood event (plus allowance for climate change). Work towards seeking betterment will be undertaken at the detailed/planning application stage when issues including levels, requisite groundworks, etc are better known. It is thereby requested that a “so far, as possible and practicable at the planning application stage” caveat clause is introduced to the policy criterion – akin to that in criterion 8 of the main “Development Principles” policy for the Strategy for Paddock Wood (Policy STR/SS1).

Revised Map 28 (Paddock Wood and East Capel Structure Plan) – There is a discrepancy on the number of pedestrian access locations for the south western parcel of the proposed Paddock Wood strategic allocation. Three locations for pedestrian access along the eastern boundary (as shown on the initial masterplans from DLA) were initially considered. However, only the northern and southern connection options, respectively, were found to be deliverable through the connection in the north to an existing PROW (footpath 0197/WT179/1) and using Council-owned land at the end of Fuggles Close (south). The central option via Mercers Close would require access to be taken through third party land, over which Dandara/the Council has no control. Technical work undertaken in December 2021 concluded that the provision of the central access was not necessary to achieve a successful development and would not provide a material benefit to either those travelling from the site to the town centre or for those travelling from externally to the local centre on site. This was accepted by TWBC and the masterplan was to be amended as such. We would be grateful if the plans could be updated to remove the central connection, or clarity provided in the key/annotations that this was a possible option.

***Q3. The Green Belt Assessment Stage 3 Study identified potential mitigation measures to reduce impacts on the perceived separation between Paddock Wood and Five Oak Green. How does the revised masterplan relate to the evidence and need to ensure separation between the two settlements?***

Land between Paddock Wood and Five Oak Green is not considered to form strategic Green Belt insofar as its function does not predominantly relate to the purpose of preventing neighbouring towns from merging. This function of Green Belt is more related to the separation of Paddock Wood from Tonbridge or Tunbridge Wells rather than Five Oak Green (considered an extended and liner village in close proximity to Paddock Wood).

Equally so, the intervening land between Paddock Wood and Five Oak Green contains urbanising features including the A228, the existing Colts Hill roundabout (including adjacent dwellings), railway line, and linear development in the eastern confines of Five Oak Green including industrial uses along Badsell Road. When travelling westwards along Badsell Road (from Paddock Wood towards Five Oak Green), the delineation between the two settlements is not significant. This arises from the developed forms around Badsell Road and Colts Hill roundabout and the linear form of Five Oak Green.

Nonetheless it is considered that the A228 provides a robust new Green Belt boundary. It contains significant hedgerows on either side which provides a sense of separation and containment to both Paddock Wood and Five Oak Green.

Criterion xiii of the policy for South West Paddock Wood requires the provision of compensatory improvements to the Green Belt. As demonstrated on the Council’s proposed Structure Plan this is achievable through:

- The provision of new and enhanced (where necessary) woodland edges to the development including along Badsell Road and A228 – this would help reduce the potential for an urbanising effect of development.

- The provision of 2no. significant “Green Wedges” within the South West Paddock Wood development. These are positioned between the 3no. development parcels and will encompass an “opening up” of this element of the Green Belt to the public including significant amenity routes, boardwalks (through floodplain) and woodland trails.
- The Green Wedge will also contain outdoor sports provision securing further amenity access to this element of the Green Belt.
- Further measures will be secured including the achievement of biodiversity net gain and detailed landscape planting across the site.

As such, the proposals will provide compensatory improvements to the environmental quality and accessibility of the site for the present and future community.

### **Issue 8 – Exceptional Circumstances**

#### ***Q1. Following the Council’s suggested changes to the Plan, do the exceptional circumstances exist to alter the Green Belt boundary in this location, having regard to paragraphs 140 – 143 of the Framework?***

In short, exceptional circumstances do exist to alter the Green Belt boundary at this location. The reasons for this can be answered in respect of the requirements to stem from the *Calverton* judgment as also transcribed within paras 145 – 146 of the Framework. The salient issues can be summarised as follows:

#### ***Acuteness of need and ability to use brownfield sites (inc. optimising densities) and underutilised land elsewhere***

The Local Plan needs to deliver c. 660 homes per annum. This is a significant extent of growth for a constrained Borough such as Tunbridge Wells. In this context, there are not considered suitable or available alternatives to accommodate the extent of growth as earmarked at Paddock Wood. Sensitive National Landscape (High Weald) predominantly surrounds the main Tunbridge Wells/Southborough area, as well as at similarly sized settlements including Cranbrook and Hawkhurst. It is recognised that proportional growth is also identified at these settlements in addition to that at Paddock Wood.

The land surrounding Paddock Wood sits within the Low Weald and does not contain the same significance in landscape terms as that in the High Weald. Equally so, Paddock Wood is considered a more sustainable settlement than Cranbrook and Hawkhurst, given it has a train station with regular trains to Tonbridge, Maidstone and Ashford. The assessment of reasonable alternatives in the SA process has already been examined in full and is therefore not rehearsed here.

For decision-making purposes, the acuteness of need in the Borough has led to the Council being unable to demonstrate a 5-year supply for a long period of time (+5 years). This further demonstrates the need for Green Belt release given the inability of the present urban areas to meet development needs in full. In this context it is noted that much development has occurred/presently underway in the main urban area of Tunbridge Wells. This includes The Potteries development (Pantiles) as undertaken by Dandara, development of the former ABC Cinema site, the Arriva bus depot site and other sites along St. Johns Road. These developments along with other growth have not satisfied the 5-year supply for some time and thus it is important that Green Belt release occurs at Paddock Wood to meet housing needs.

### *The ability for neighbouring authorities to accommodate some of the identified need*

The Duty to Cooperate has been examined at length and the process is therefore not repeated here. In short, discussions have occurred with neighbouring authorities including Tonbridge and Malling BC, Sevenoaks DC and Maidstone BC with regard meeting needs. As such it is important to note:

- Tonbridge and Malling also contains large portions of Green Belt land, extending to c. 70% of the Borough area. In this context, Green Belt washes over much of the western element of the Borough which shares the same housing market area (West Kent HMA) with both Tunbridge Wells and Sevenoaks.
- Sevenoaks contains over 93% Green Belt and is thus not feasible for needs to be decanted to Sevenoaks.
- The Maidstone Local Plan Review has very recently been adopted (20 March 2024). It is thereby at a stage where it is unable to meet the needs of Tunbridge Wells and it is noted it seeks to meet its own significant need of 1,157dpa up to 2038.

Neighbouring authorities are therefore unable to meet the need as identified at Paddock Wood.

### *Exceptional Circumstances*

It is clear that exceptional circumstances exist to release the Green Belt at this location. This is supplemented by the benefits of strategic development at Paddock Wood including infrastructure delivery of Colts Hill by-pass, sports and education provision as well as meeting needs including for affordable and older persons housing.