

## **Tunbridge Wells Local Plan Examination**

### **Response to the Inspector's Questions relating to Matter 3 on behalf of Gleeson Strategic Land**

TCPS 618C  
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## Introduction

This response is on behalf of Gleeson Strategic Land (Gleeson) who have land interests at the south eastern edge of Tunbridge Wells at Sandown Park, on the northern side of Pembury Road (SHELAA site number 99). Gleeson submitted representations to the Pre-Submission Draft version of the Local Plan these have been recorded as 'Comment Numbers' 208, 209, 213, 221 and 222 on the Council's PSLP schedule of representations (Core Document number 3.125a).

### **Matter 3 – Spatial Strategy and Distribution of Development (Policy STR1, STR3, STR9 and STR10)**

#### *Issue 1 – Spatial Strategy*

Q1. Does the submission version Local Plan contain a settlement hierarchy in the same way as the adopted Core Strategy (2010) does?

1. The adopted Core Strategy provides a clear 'settlement hierarchy' to "*determine how development is quantitatively distributed*" (paragraph 4.5), with Royal Tunbridge Wells and Southborough comprising the "Main Urban Area" within tier 1, followed by three "Small Rural Towns" of Cranbrook, Hawkhurst and Paddock Wood within tier 2 and 17 villages with defined development boundaries, within tier 3. Table 3 shows that the Main Urban Area is the focus for accommodating 75% of the new housing provided for in the Plan.
2. Within the Submission Draft Local Plan, the development strategy retains the use of defined 'Limits to Built Development' around settlements but within draft Policy STR1, there is no defined settlement hierarchy comparable to that within the currently adopted Core Strategy. The focus is to seek to meet development needs on previously developed land and on land within settlement boundaries that now include 'growth settlements' incorporating the significant expansion of Paddock Wood as well as creation of a new 'garden settlement' at 'Tudeley Village situated between Paddock Wood and Tonbridge.
3. Previously, it was clear that Royal Tunbridge Wells/Southborough was the main focus for accommodating new development as a 'Regional Hub' promoted through the former South East Plan. In the Submission Draft Local Plan, the main focus for accommodating development has moved away from the Main Urban Area and towards the expanded settlement at Paddock Wood and the new settlement at Tudeley Village (based on the distribution set out in Table 4).
4. The Main Urban Area is however, the most sustainable location for accommodating future housing growth given its sub regional function, its wide range of retail, employment and community facilities and its public transport and other transport connections. Having previously identified an option for a potential growth corridor ('Option 4- Growth Corridor-led Approach') along the A21/Pembury bypass transport route along the eastern side of the Town (which

had a good level of support at the 'Issues and Options' consultation stage), the Council has instead opted for a strategy incorporating a new and expanded settlements away from the Main Urban Area. Given the higher order nature of the Main Urban Area, the development strategy focus should have been to more fully explore and examine Green Belt land lease on the eastern side of Tunbridge Wells in order to minimise Green Belt land release at less sustainable locations at Paddock Wood and Tudeley.

- Q2. The *Settlement Role and Function Study Update*<sup>5</sup> scores settlements and groups them together between A and G. Is the methodology used robust and are the outcomes accurate?

The method for ranking settlements on the basis of a points system is highly subjective does not appear to translate into any focused option for the of distribution of development in draft Policy STR 1.

- Q3. What is the purpose of the *Settlement Role and Function Study Update*? How has it informed the Plan?

The Settlement Role Function Study Update does not appear to serve any purpose in informing the proposed distribution of development in draft Policy STR1 and thus, the settlement grouping A – G, appears to be a rather meaningless exercise in this respect.

- Q6. Paragraph 4.45 of the submitted Plan states that Royal Tunbridge Wells is surrounded by the High Weald AONB, except for areas to the west and the north. What options has the Council therefore looked at for new development to the west and the north of the town? Why were they discounted in favour of a standalone new settlement (which also requires land to be removed from the Green Belt)?

This question might be reasonably widened to also ask the Council what options it has considered for potential expansion on the eastern and south-eastern side of Royal Tunbridge Wells, in the areas that are also outside the HWAONB designation?

- Q7. The *Development Strategy Topic Paper*<sup>6</sup> refers to constraints to such as the Green Belt, the High Weald AONB and areas of flood risk. Which areas of the Borough are not constrained by flooding and/or the Green Belt and AONB? Why could housing needs not be met in these areas?

These areas are set out in the Council's Development Constraints Study published in October 2016.

- Q8. Could housing needs be met in a way that did not require land to be removed from the Green Belt and/or require development in the AONB?

Paragraph 4.43 of the Submission Draft Local Plan, confirms that;

- 4.43 It is found that, even promoting all suitable SHELAA sites for allocation in the Local Plan, the borough could meet only a fraction of its housing need without the provision for strategic sites, namely the substantial expansion of Paddock Wood (including land at east Capel) and the creation of a new garden settlement at 'Tudeley Village'. With these proposals, the Local Plan can meet the housing need in line with the NPPF's standard method.

Furthermore, in the Council's 'Matter 2 Clarification Note' in relation to the Sustainability Appraisal (03 March 2022 – Doc Ref TWLP/007), without the release of any Green Belt land ('Growth Strategy 1') the amount of housing would need to be reduced by some 5,650 homes (49% of housing need in relation to the 11,526 dwelling requirement), and if there were to be no major development within the AONB ('Growth Strategy 2'), the scale of housing would be produced by between 1,600 – 2000 dwellings (17% of the requirement).

- Q9. Do policies relating to the Green Belt, the High Weald AONB and/or flood risk provide a strong reason for restricting the scale, type and distribution of development in Tunbridge Wells?

Clearly, Green Belt and the HWAONB policies and areas of flood risk present major constraints to accommodating the Plan's housing requirement, including the provision of affordable housing. Nevertheless, the Green Belt and AONB policy constraints need to be balanced with the pressing need for more housing especially in light of similar policy and landscape constraints in neighbouring authority areas. Within this context, it is important to establish that all opportunities have been fully considered and explored in relation to the release of suitable Green Belt land within the immediate vicinity of the Main Urban Area, as the most sustainable location for accommodating housing development, in order to minimise the release of Green Belt land within less sustainable locations, and to reduce the need for major development within the AONB.

*Issue 2 – Distribution of Development*

- Q1. How was the distribution of development established? Has the Council sought to direct housing growth towards settlements based on their scoring in the *Settlement Role and Function Study*, or by another means?

The proposed distribution of development does not follow any hierarchy of settlement function and size unlike in the currently adopted Core Strategy and is unclear how the Settlement Role Function Study has played any significant part in the proposed distribution of development set out in draft Policy STR1.

- Q3. Is the strategy consistent with paragraph 105 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?

The Council's distribution of development strategy is not in accordance with paragraph 105 of the NPPF given that Council has not properly assessed the option of releasing Green Belt land at the south eastern edge of Royal Tunbridge Wells (as part of the Main Urban Area), in preference and prior to the consideration of release of Green Belt land at less sustainable locations, including the proposed significant Green Belt land release at new garden settlement at Tudeley Village.