

planning  
transport  
design  
environment  
infrastructure

Response to Inspector's Issues & Questions: Matter 7 Response  
on behalf of Countryside Partnerships

May 2022 JB/16370



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# **1 Introduction**

## **1.1 Background**

- 1.1.1 This Statement has been prepared by DHA Planning on behalf of Countryside Partnerships (hereafter referred to as Countryside) in response to the Inspector's Questions on Matter 7 (Residential Site Allocations) in respect of the Tunbridge Wells Borough Council Local Plan Examination.
- 1.1.2 Countryside controls land at Pembury which is proposed to be allocated for approximately 80 residential units under site reference AL/PE3: Land North of the A21, South and West of Hastings Road.
- 1.1.3 Countryside supports the proposed allocation. Jonathan Buckwell of DHA Planning will attend the Examination to assist the Inspector in relation to this site.
- 1.1.4 In our Regulation 19 representations, we commented that notwithstanding the support for the policy, the inclusion of criterion 12 appears to us to be unnecessary. This states that the applicant should liaise with Southern Water regarding capacity to serve the development, and to provide details of this. Southern Water will of course be consulted on any future application, but they are obliged under the Water Industry Act to provide a connection to the site, which the developer will contribute to through the Infrastructure Charge. As a result, this criterion seeks to deal with a matter which is already satisfactorily addressed through other legislation, and so is unnecessary.

## 2 Matter 7: Residential Site Allocations

### 2.1 Issue 2: Pembury

2.1.1 Where relevant, Countryside respond to the Inspector's questions in relation to site AL/PE3 as follows.

### 2.2 Q16. How has the proposed area of residential development been established? What is it based on and is it justified?

2.2.1 As set out in our Reg.19 response, Countryside have developed a draft illustrative framework plan for the site, which demonstrates that a development of approximately 80 units can be achieved whilst taking account of the constraints identified within the policy.

2.2.2 They are now undertaking further, more detailed assessment work to refine this. They have had initial discussions with the Pembury Neighbourhood Plan group, and have commenced pre-application discussions with TWBC. We are not yet in a position to share an updated plan pending further drainage, landscape and ecology studies which are at an early stage, but Countryside remains confident that the scheme can be developed in accordance with the draft allocation policy requirements.

### 2.3 Q20. Where will the main access to the site be taken from?

2.3.1 A priority access will be developed from Hastings Road, with an initial carriageway width of 5.5m. Footways measuring 1.8m will be provided on entry to the site. Figure 2.1 shows the indicative layout presented at the Reg. 19 stage. As discussed above, the plans are being refined from here, and as part of this the access location has been adjusted to that shown by the red arrow in Figure 2.1. This is the location that has been presented to KCC in our current discussions.



Figure 2.1: Indicative masterplan presented at the Reg.19 stage

- 2.3.2 Both Kent County Council Highways & Transportation (KCC H&T) and National Highways have been consulted on the scope of Transport work to accompany a future planning application, and they have been provided with the above details in relation to the proposed access location.
- 2.3.3 KCC H&T have not raised any concerns in relation to the principle of the access in the location shown. National Highways has also confirmed that the proposed location is situated well away from the A21 priority junction with Hastings Road/Henwood Green Road and that it will not interfere with the operation of the trunk road network.
- 2.3.4 As part of any forthcoming planning submission, a Stage 1 access design will be prepared, together with an independent Stage 1 Road Safety Audit. Visibility splays for the site access will be considered with respect to the signposted speed limit of 30mph and Manual for Streets guidance. KCC H&T have requested that consideration also be given to the 85<sup>th</sup> percentile vehicle speeds across the site frontage. An Automatic Traffic Count (ATC) will be completed to establish these.

***Emergency access***

- 2.3.5 An emergency access to the site has been requested by KCC H&T. It is proposed to provide this at the existing gated access at the eastern end of the site (where the red dashed cycle route line emerges onto Hastings Road in Figure 2.1). Demountable bollards would be provided to restrict its use to emergency vehicles only. This access will also be utilised for pedestrians and cycles.

***Displaced on-street parking***

- 2.3.6 Following initial engagement with Tunbridge Wells Borough Council (TWBC), a survey was completed on the section of Hastings Road that bounds the site, to quantify the level of on-street parking that takes place and the extent to which this would be displaced through the formation of the site access. It is noted in this respect that the majority of residential properties fronting Hastings Road have on-plot parking available to them; therefore reducing the necessity to park on-street.
- 2.3.7 An overnight parking stress survey was completed on Thursday 16th and Friday 17th January 2020 by K&M Traffic Surveys. This survey demonstrated that on both nights, there were approximately eight vehicles parked on-street in the vicinity of the proposed site access and within its visibility splay envelope.
- 2.3.8 The survey also indicated that there were in excess of 20 unoccupied parking spaces on Hastings Road on both nights, which could comfortably accommodate this displaced parking. On this basis, it is evident that the implementation of the proposed site access would not have a detrimental impact to the existing on-street parking provision and that there would be no requirement to provide replacement parking within the site confines. Nonetheless, the parking beat survey can be updated to accompany any future application and ensure the previous survey remains reflective of onsite conditions.