

Culverden Residents' Association responses to the Inspector's questions in relation to Matter 7 Residential allocations Royal Tunbridge Wells and Southborough

The Culverden Residents' Association was founded in 2013 and currently represents some 98 members living in Culverden and St John's Wards on Culverden Park Road, Culverden Park, Culverden Avenue and Campbell Road, parts of Culverden Down and Reynolds' Lane as far up as Caenwood Farm. We have representation on the Royal Tunbridge Wells Town Forum and participate actively in its work. We submitted some 23 responses on draft policies under the Regulation 19 Consultation, to which the Inspector is referred including a detailed consideration of site AL/RTW 5, having previously submitted responses to the Issues and Options and Regulation 18 Consultations.

Hearing Day 10, 17th June Matter 7 Residential Site Allocations RTW/Southborough

Issue 1 Royal Tunbridge Wells and Southborough

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

Question 27: How has the scale of proposed development been determined and is it appropriate and justified in this location?

In addition to serving all 5 statutory purposes of the Green Belt, this site is currently part of a much larger area of Green Belt land to the west of Reynolds Lane which has “*a resolutely rural sense of place*” (per appeal decision APP/M2270/A/14/2213159), contains two important landscape ridges, is part of a Biodiversity Opportunity Area and is adjacent to a Local Wildlife Site. This wider area contains early medieval assart fields, a large medieval farmstead at Smockham Farm and a network of ancient routeways, including Reynolds Lane.

Sites 30, 100, 199, 205 were promoted under the Call for Sites process and all were ruled out for further consideration under the first iterations of the SHELAA and Sustainability Appraisal, including the part now put forward as AL/RTW5. This site was not allocated under the Regulation 18 Consultation and was a last minute addition to the allocation process and not made subject to full public consultation.

In the above circumstances the nature and scale of proposed development does not appear appropriate or justified in this location and this is reinforced by our view that there are no exceptional circumstances justifying residential development of the site at the present moment.

However, should the Inspector be minded to approve any allocation on this site, the presently proposed density would seem grossly inadequate and would need to be radically increased to make effective use of land taken out of the Green Belt (and/or the development footprint substantially reduced to minimise the land taken out of the Green Belt), as is required by the 2021 edition of the NPPF.

Question 28: What is the site boundary based on? Is it sufficiently clear to users of the Plan where residential development is expected to be located?

The proposed allocation does seem to indicate broadly where residential development is expected to be located though more detail would need to be provided.

Question 30: Will it be possible to widen Speldhurst Road and retain trees along the site frontage?

The SHELAA site assessment sheets and Sustainability Appraisal of AL/RTW5 land suggested that the site was “*well screened from surrounding roads and houses*” and this was repeated in paragraph 5.51 of the Regulation 19 Draft. This screening occurs mainly through the continuous mature hedgerow/ tree boundary which runs along the south side of Speldhurst Road and is covered by a Tree Preservation Order. It was a significant factor used to seek to justify a site allocation here. Widening Speldhurst Road would not be compatible with maintaining the effective screening of any development as it could not be done without either removing the screen or demolishing the houses opposite. Any allocation would therefore need to stipulate that the existing tree cover on Speldhurst Road will be maintained except at the immediate point of any new road access.

Question 31: Do exceptional circumstances exist to alter the Green Belt boundary in this location, having particular regard to paragraphs 140 – 143 of the Framework?

We discussed this much more extensively in our response to the Regulation 19 Consultation. Paragraph 141 of the NPPF states that “*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development*” including whether the strategy makes as much use as possible of suitable Brownfield and other underutilised sites at an optimal density.

We do not believe that TWBC has demonstrated that exceptional circumstances exist as it has not examined fully all other reasonable options to site AL/RTW5 for meeting its identified need for residential development. A major review of land in Royal Tunbridge Wells town centre has begun in order to produce a Town Centre Area Plan which will become part of the Local Plan. It would only be necessary to identify places for a further 100 dwellings during the Plan period to replace those which would be lost by cancelling the allocation at Caenwood Farm. At higher densities, this should not be difficult to achieve. Additional dwellings in the town centre would be far more effective and justified in the long term sustainable interest of the town and in mitigating the climate emergency than extending its area into the countryside.

Hearing day 11, 21st June Matter 7 continued

AL/RTW 20 – Land at Culverden Stadium (considered under AL/RTW 19 Hawkenbury Recreation Ground)

Question 47: Can approximately 30 dwellings be achieved on the site of the existing football ground, having particular regard to the presence of protected trees and wildlife habitats?

We have serious concerns about the potential layout of dwellings on this sensitive, downward-sloping site which provides a wildlife corridor along its northern boundary. The whole of this long Culverden Ridge is also of significant landscape importance and maintains an unbroken natural landscape profile. The northern edge of site AL/RTW 20 is formed of tree cover at the top of the escarpment and this is highly visible from the neighbouring AONB at Salomons

Estate/ west of Broomhill Road and from western parts of Speldhurst Road. This deciduous tree cover becomes very thin over the winter months.

Owing to the landscape sensitivities of the site, any allocation agreed should be subject to a Landscape and Visual Impact Assessment to inform locations and building heights, which should be strictly controlled. This would probably reduce the number of dwellings possible on the site and affect the nature of any proposed development. There would also need to be a condition within any allocation policy that the tree cover on the northern boundary on the escarpment should be strengthened with mature specimens to provide all-year tree cover to protect the landscape beyond from views of any built development on the site.

There is also a continuing problem of excessive through traffic in our neighbourhood and any increase in vehicle use through new development on top of existing traffic could place an unacceptable environmental and health burden on our residents. This might be significantly mitigated by severing Reynolds Lane to prevent rat-running through traffic past the site on Culverden Down. The consequent reduction in traffic levels in Culverden generally would enable any additional traffic generated by this site to be reasonably accommodated.