



# Phase 2

**Tunbridge Wells Borough Council**  
**Local Plan Examination in Public**  
**Hearing Position Statement - Matter 7 Site Allocations**

**Submitted on Behalf of Rosconn Strategic Land Ltd**

**May 2022**

**Our Ref: C22026**

**Phase 2** PLANNING & DEVELOPMENT LIMITED

270 Avenue West | Skyline 120 | Great Notley | Braintree | Essex | CM77 7AA | 01376 329059 | [www.phase2planning.co.uk](http://www.phase2planning.co.uk)

---

## Quality Assurance

**Site Name:** Land south of Benchley Road, Horsmonden

**Client Name:** Rosconn Strategic Land Ltd

**Type of Report:** Representations to Examination in Public

Author	Initials	Date
<b>Lisa Skinner</b> BSc(Hons) MA DipMgt MRTPI Director	<b>LS</b>	May 2022

Reviewed	Initials	Date
Samantha Stephenson BA (HONS), MScTP, MRTPI Principal Planner	<b>SS</b>	May 2022

---

## Contents

1. Introduction .....	1
2. Matter 7 Site Allocations .....	2

### APPENDICES:

Appendix 1 - Inset Map 26, Submission Local Plan

Appendix 2 - Map 61, Site Layout, Submission Local Plan

---

## 1. Introduction

- 1.1 This Statement has been prepared on behalf of our client, Rosconn Strategic Land Ltd who has a promotion agreement with the landowner on 3.6 ha of land to the south of Brenchley Road and west of Fromandez Drive, Horsmonden, Kent.
- 1.2 The site has been promoted through the emerging Local Plan process and is now identified as a draft allocation within the Tunbridge Wells Borough Submission Local Plan 2020-2038 (Submitted October 2021), hereafter referenced as “The Plan”. The site is identified as Draft Policy AL/HO2 for residential development providing approximately 80-100 dwellings, a replacement village hall and associated parking.
- 1.3 In this submission, we respond specifically to Matter 7 - Site Allocations, Issue 13 – Horsmonden

---

## 2. Response to the Inspector's Questions

### AL/HO1 – Land Adjacent to Furnace Lane and Gibbet Lane

Q1. What is the latest position regarding the construction of dwellings already approved on the site?

2.1 No comment.

Q2. Is the allocation developable within the plan period?

No comment.

### AL/HO2 – Land South of Brenchley Road and West of Fromandez Drive

Q3. What is the justification for requiring the provision of a replacement village hall and car parking? How and when will this be delivered?

2.2 The replacement village hall has been requested by the Parish Council as a response to the additional pressure from the increase in the number of residents that will occur as a result of the new development coming forward across the entire village. The new village hall is also referenced on page 157 of the Infrastructure Delivery Plan, October 2021.

2.3 The current village hall is located on a constrained site, is restricted in size with a floor area of approximately 250 square metres with only limited parking and outdoor facilities. There is no real opportunity to extend the existing facility due to the site constraints and due to the internal layout, only certain activities can take place internally. It is therefore not considered to be fit for purpose to meet the needs of the growing population in the village.

2.4 The new village hall would be over twice the size with a floor area of 520 square metres. It would be designed to provide a more open internal layout that would allow a greater flexibility of use that could accommodate sports activities such as badminton, table tennis and indoor bowls as well as other wider community events. Suitable onsite parking including disabled parking would also be provided. This would lead to improved community facilities within the village which is supported by the NPPF.

2.5 In relation to delivery, Rosconn are committed to providing the land for the village hall but the overall construction costs will need to be split between the other developments coming forward. This would be consistent with the approach the Council has taken to date in respect of planning permission for 49 dwellings, 18/01976/FULL, at Gibbet Lane/Furnace Lane that sought a financial contribution to this provision. The funding should therefore be sought via

---

section 106 agreements that mitigate the impact of a development which are directly related to the development and fairly and reasonably related in scale and kind as required by the CIL Regulations and the NPPF.

2.6 There is currently no reference to the village hall within Draft Policy PSTR/HO1, The Strategy for Horsmonden parish. This policy will therefore need to be modified to include developer contributions for the new village hall.

2.7 There is also an impact on Policy AL/HO2, point 11 that states:

*“A suitable legal mechanism shall be put in place to ensure that the provision of the replacement village hall and associated parking is tied to the delivery of the housing, at a suitable stage of the development, to be agreed at the planning application stage;”*

2.8 This policy is unclear and needs to be updated to clarify that the development of AL/HO2 will provide the land for the new village hall along with an appropriate financial contribution commensurate with the level of development that is brought forward on this site and other development within the village.

2.9 Rosconn has also requested other amendments to the wording of Policy AL/HO2 in our written representations on the Pre-submission Local Plan. In summary, we believe Policy AL/HO2 should be amended as stated in the following paragraphs.

2.10 Point 3 – *“Opportunities to be explored for extending the 30mph speed limit westwards along Brenchley Road to include the site, and provision of associated gateway features;”*

Comment - The 30mph limit has already been removed. This point should be deleted.

2.11 Point 4 – *“Provide a pedestrian access from the site along Brenchley Road to link with the wider footway network;”*

Comment - This is achievable on land within the public ownership, i.e., adopted highway land

2.12 Point 5 – *“Opportunities to be explored to provide a pedestrian access into the Sprivers historic park and garden from the site;”*

Comment - Rosconn have already had discussions with the National Trust who are the owners of Sprivers Park and Garden. Whilst improving connectivity in this area would support recreational activity, this has to be carefully balanced in relation to the potential impact on the ancient woodland. This can only be established through detailed technical reports and to date there is no evidence to justify this request. We therefore believe due to the potential

---

impacts on the environment as a result of opening this area up and increasing the intensity of use of the woodland, this point should be removed.

- 2.13 Point 6 – *“Residential development shall be located on the areas identified for residential use on the site layout plan, with the provision of a village hall on the land indicated for community use on the site layout plan;”*

Comment - We object to the inclusion of this clause that stipulates where residential development should take place and the allocation of other designated uses such as the village hall.

- 2.14 In respect of the Inset Map 26 for Horsmonden, attached at Appendix 1 for reference, we are concerned at the use of the red line that delineates the alteration to the limits for built development and the dark blue line that indicates the site allocation boundary. In addition, further designations are shown on the Map 61 Site Layout, page 260 for allocation AL/HO2 that includes community use and open space and landscape buffers. A copy of Map 61 is attached at Appendix 2 for reference. These designations are a result of high-level assessments that are not informed by detailed technical reports. The lines drawn could frustrate good design and restrict the approach to development across the site. The red built development line is therefore not considered to be effective and should be extended to cover the entire site allocation. This is also pertinent as the open recreational buffer zones may involve operational works along with the potential for play areas etc. In the case of the community use designation, a low narrow zone may not be the most appropriate effective use of the land. Flexibility is therefore important to ensure good design and the optimum use of the land.

- 2.15 In our Pre-Submission Representation for Policy AL/HO2 in relation to criterion 6, we stated that in order to meet the lower yield figure of 80 on draft allocation AL/HO2, the Council’s approach would lead to a density of 46 dwellings per hectare which is not considered appropriate in an edge of settlement location. A balance needs to be struck between ensuring an effective use of the land that responds to the character of the area. In addition, the allocation for AL/HO2 includes a significant area of land for the community hall but we are unsure as to how the land take has been considered. To ensure an optimum use of the site, further information and technical evidence would normally be available to ensure the most appropriate development comes forward. We believe the current position would frustrate and restrict development unnecessarily.

- 2.16 Point 7 – *“The open space and landscape buffer indicated on the site layout plan shall include a buffer to ancient woodland on the western part of the site, and reinforcement of the southern landscape boundary;”*

---

Comment - The reference to the site layout plan should be removed as this is prescriptive and would adversely impact good design and layout as referred to at point 6 above.

Q4. What potential impacts will the proposed allocation have on the significance the Grade II listed Milestone Cottages opposite the site? How have heritage assets been taken into account in the preparation of the Plan?

- 2.17 The impacts on Milestone Cottages have been taken into account in the wider Parish assessments for Horsmonden, Site Assessment Sheets for Horsmonden Parish, that formed part of the SHLAA, January 2021. The site itself does not contain any designated or non-designated heritage assets. However early on in the review process, the Council identified the potential impact on the setting of certain designated assets. In relation to Milestone Cottages, the impacts have been considered on the setting and we agree with the Council that a suitable layout and design will safeguard the setting of the listed building.

Q5. What potential impacts will the proposed allocation have on Sprivers Wood?

- 2.18 The policy seeks to ensure any future development includes landscape buffer zones to the sensitive boundaries of the site that would include additional planting that would reinforce the existing natural features on the site. Other potential impacts on Sprivers Wood will depend on whether this area of land is opened up for access by the public and whether this increased activity could have a negative impact.

AL/HO3 – Land to the East of Horsmonden

Q6. How has the proposed area of residential development been established? What is it based on and is it justified?

- 2.19 No comment.

Q7. What is the justification for the proposed area of safeguarded land for the primary school? How does it relate to the existing school site?

- 2.20 No comment.

Q8. What is the justification for the proposed 'community use' area? Is it necessary and how/when will it be delivered?

- 2.21 No comment.



---

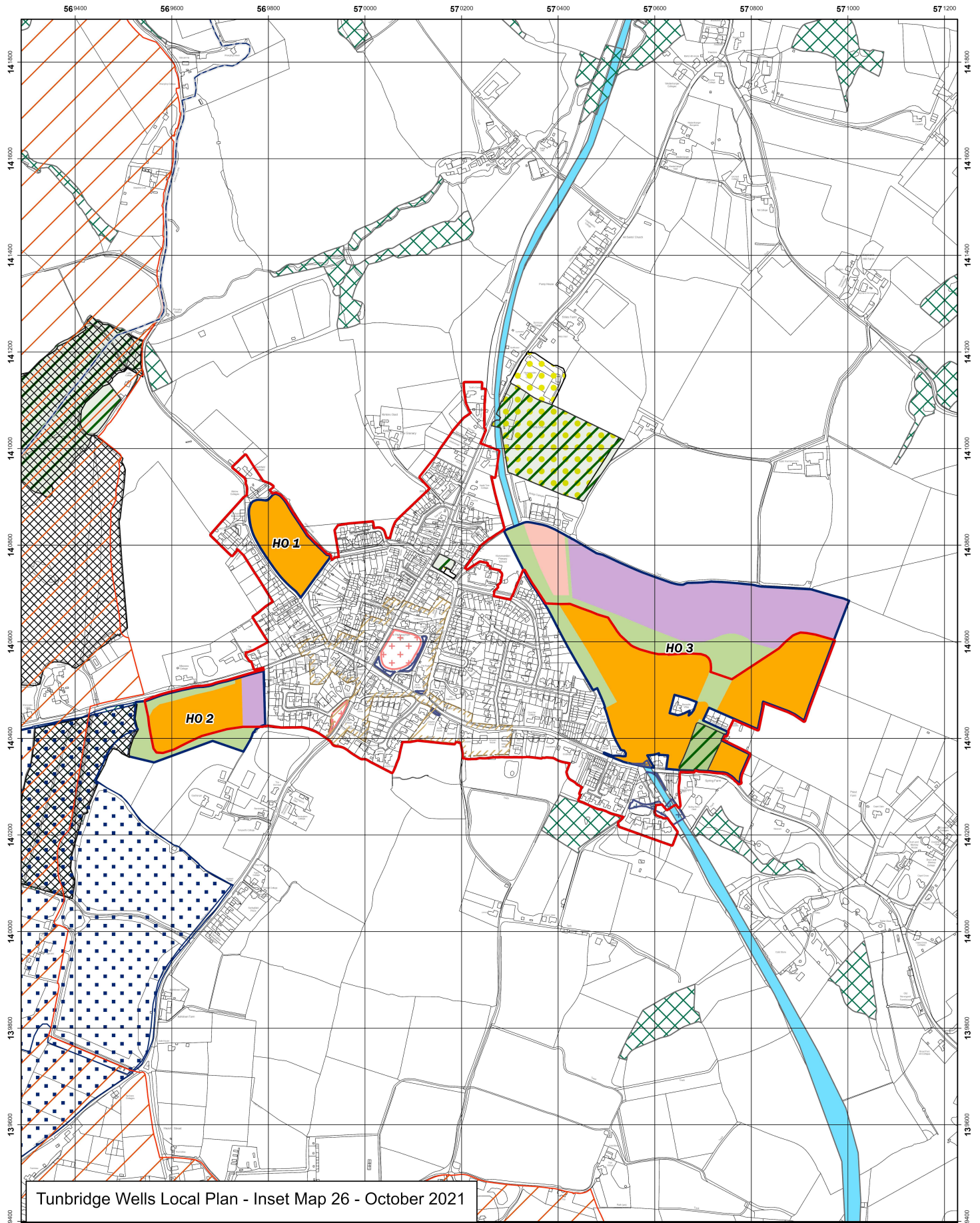
Q9. Is the location of the proposed health centre/doctor's surgery appropriate and justified?

2.22 No comment.

Q10. What is the justification for requiring a community orchard and built development to the east of the site to be at a lower density?

2.23 No comment.

## Appendix 1

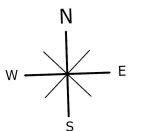
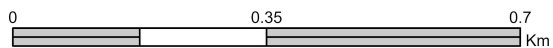


Tunbridge Wells Local Plan - Inset Map 26 - October 2021

Horsmonden

Scale: 1:7,000

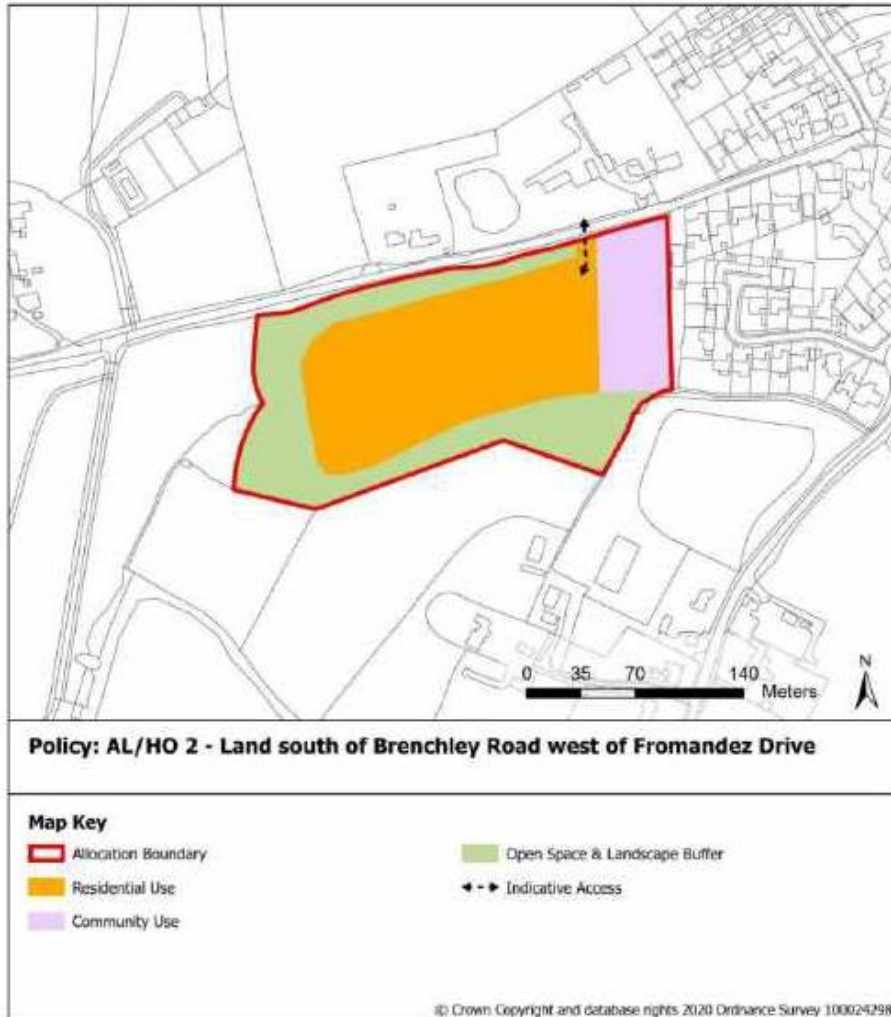
Horsmonden



## Appendix 2

**Extract, page 260, Submission Local Plan - Land south of Brenchley Road and west of Fromandez Drive**

**Map 61 Site Layout Plan**





# Phase 2

PLANNING &  
DEVELOPMENT  
LIMITED