

Tunbridge Wells Borough Local Plan Examination

Hearing Statement in response to Matter 6 – Strategic Sites (Policies STR/SS1, STR/SS2, STR/SS3, STR/PW1 and STR/CA1)

Prepared on behalf of Hadlow Estate and submitted to the Programme Officer on 11th May 2022

Issue 1 – Tudeley Village

Size, Scale and Location of Development

Q1. What is the site area based on and how was the size of the allocation and number of new homes established?

The site area for Tudeley Village is just over 170 hectares, with anticipated capacity for about 2,800 new homes (2,100 to be built by 2038).

The site area of 170 hectares corresponds to what was submitted by Hadlow Estate during the 'Call for Sites' stage of the new TWBC Local Plan, referred to as site 448. The site was identified by the Estate on the basis that it had clear boundaries, with the B2017 road to the south, Hartlake Road to the west, Sherenden Road to the north as well as trees, hedgerows and field boundaries to the east. It was also of a sufficient scale to enable the delivery of a community with employment opportunities, social and recreational facilities sitting alongside housing.

As the Distribution of Development Topic Paper for Draft Local Plan – Regulation 18 Consultation, September 2019, notes, 'the site [was] considered suitable as a potential Local Plan allocation subject to further consideration', in light of the factors for planning for new settlements set out in paragraph 73 of the National Planning Policy Framework (NPPF).

Paragraph 73 of the NPPF describes steps for identifying suitable locations for larger scale development including new settlements. Hadlow Estate identified site 448 as a suitable location for allocation as a strategic growth site in the TWBC Local Plan based on the same criteria including ensuring that its size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself without expecting an unrealistic level of self-containment.

The size of the allocation and number of new homes is informed by the type and quality of settlement that the Estate is proposing. The Tudeley Village site is large enough to accommodate the number of homes required to support and maintain a sustainable community, with capacity for around 2,800 homes, in addition to a broad mix of employment, education, commercial and leisure uses and other services. It is proposed that Tudeley Village meet the basic needs of its residents within the settlement itself, and it enjoys good transport links with local settlement centres and regional transport infrastructure.

Paragraph 73 (c) of the NPPF refers to setting clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensuring that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community.

Hadlow Estate is committed to delivering a new settlement which is designed, built and maintained according to garden settlement principles, as set out at paragraph 5.226 of the TWBC Local Plan. In its Delivery Strategy (published December 2020 and submitted to

TWBC) Hadlow Estate has described in detail its commitment to create a high-quality settlement inspired by towns and villages in the Kent countryside. The Estate has adopted a clear and ambitious vision which has guided the creation of a masterplan for Tudeley Village: to build a new village community at Tudeley which meets the needs and aspirations of the local community, contributes to the long-term sustainability of the region, embodies quality, craftsmanship and best urban planning practice, and reflects and sustains the local tradition of village planning in Kent. As both the landowner and master developer, Hadlow Estate is not just committed but also has the ability to ensure this vision is delivered. The Estate will use design codes and other governance mechanisms to control the quality of development at Tudeley Village.

Paragraph 73 (d) of the NPPF refers to making realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identifying opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations).

In its Delivery Strategy, December 2020, Hadlow Estate has set out its proposed realistic phasing plan for Tudeley Village and its approach to land release, the appointment and management of housebuilders, and the means to ensure quality throughout the duration of the project.

Paragraph 73 (e) of the NPPF refers to considering whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

Development at Tudeley Village involves the release of existing Green Belt land, meaning that the new settlement will be surrounded by existing Green Belt. The proposed Green Belt boundaries will be clear and defensible, limiting encroaching onto the Green Belt, as addressed in more detail at Q5.

As to the size of the allocation and the number of new homes, as noted above and in the Council's Topic Paper, para 73(b) of the NPPF refers to ensuring that the size and location of a new settlement will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment). The Council's Topic Paper refers to the principle of supporting every day services, such as shops, education and healthcare provision which will influence the quality of place, the level of containment and ultimately households' decisions to live there.

The Topic Paper identifies that Appendix 4 draws on evidence from the Role and Function Study (2017) comparing population numbers of settlements within the Borough to the types and numbers of facilities available. Based on this and the information in the Infrastructure Delivery Plan, it is clear that the size of the allocation and the proposed number of new homes at Tudeley Village has been properly considered and is soundly based in light of the principles in paragraph 73 of the NPPF and there is a clear and proper evidence base demonstrating why Tudeley Village will be a sustainable settlement of sufficient size to support a sustainable community, supporting a good range of services and facilities.

Further detail is contained in the Distribution of Development Topic Paper itself.

Q2. What alternatives to the size and scale of development proposed in the Plan has the Council considered?

The Site Assessment Sheets for Capel Parish, which are part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) published by Tunbridge Wells Borough

Council (TWBC) in July 2019, reflect the assessment of all sites in Capel Parish that were submitted in response to the Call for Sites issued by TWBC during the plan-making process through which consideration has been given to alternatives of different size and scale generally and in and around the Tudeley site.

Two alternative sites for a new settlement at Capel Parish were assessed in the SHELAA itself. Both proposed alternatives covered areas larger than the present Tudeley Village site, and both were rejected in favour of the proposed Local Plan allocation. In summary:

- Site 446. Site address: Land at Tudeley, Tudeley, Tonbridge included sites 178, 183, 308, 418, 440, 446, 448, 452 and 453. This site covered an area of 299.32 hectares, including the area presently proposed for development as Tudeley Village plus additional land, mostly to the south of the Tudeley site. While the Site Assessment considered that the site was likely to be deliverable, it concluded that ‘given the strong policy protection given to the AONB (a national designation) in the NPPF, the whole site is considered unsuitable as a potential Local Plan allocation’.
- Capel Reasonable Alternative. Site address: Land at Tudeley, Tudeley, Tonbridge including sites 178, 183, 308, 418, 440, 446, 448, 452 and 453. Described in the SHELAA as having an area of 299.32ha, this site covered an alternative area to site 446, while providing the same capacity for development. However, like site 446, the SHELAA found this whole site unsuitable as a potential Local Plan allocation.

In addition, as the Development Strategy Topic Paper for Pre-Submission Local Plan, February 2021 describes at paragraphs 6.98, ‘further to the consideration of two options for a new village at Tudeley at the draft Local Plan stage, following consultation responses, an additional, smaller option for the development was considered appropriate to assess, still in line with the minimum advocated size of a garden settlement’. In summary, the three options were:

1. Approximately 1,500 dwellings to south of the railway line
2. Approximately 2,800 dwellings, straddling the railway line
3. Approximately 5,000 dwellings, following the same pattern as [Option 2] but extending southwards where land is not constrained by Flood Zone 3, but is in the AONB and Green Belt.

Balancing the benefits associated with larger scales of growth against the environmental impact of development in the AONB and larger areas of the Green Belt, the Sustainability Appraisal found that Site 448, Land at Tudeley, Tudeley, Tonbridge, was most suitable as a potential Local Plan allocation. Further detail can be found in the Strategic Sites Topic Paper, Chapter 5.

Q3. The submission version Policies Map for Tudeley Village shows land beyond the Limits to Built Development forming part of the allocation. What is the reason for this? Is all of the allocation proposed to be removed from the Green Belt?

The drawing of the exact boundaries of the allocation is a matter for TWBC. The Provisional Limit Built Development indicated on Submission Local Plan Inset Map 8 Tudeley Village (3.129e(ii)) includes the full area of the site allocation and it is proposed to be removed from the Green Belt and the Estate considers removal of the full area of the site allocation is the correct approach, based on TWBC’s assessment of the site and requirements to deliver Tudeley Village.

For example, TWBC’s Green Belt Study Stage Three, November 2020, identifies the full Strategic Site Area defined by Inset Map 8 Tudeley Village as land to be released from

Green Belt (page 66), noting at paragraph 4.105 that this area will be released ‘to facilitate the delivery of a new stand-alone settlement’.

As defined by the Strategic Site Area, the proposed release of Green Belt land will result in a clear and defensible new boundary to the Green Belt which is defined to the south, south-east and south-west by Five Oak Green Road (B2017); to the north-west by Hartlake Road; to the east by a series of hedgerows and ditches dividing arable fields; and to the north by the extent of flood zone 2.

Green Belt

Q4. The Green Belt Study Stage 2 report concluded that releasing land from the Green Belt between Tonbridge and Paddock Wood (Ref BA4) would cause a ‘very high’ level of harm to the Green Belt. In the Stage 3 Assessment, a harm rating of ‘High’ is given for Tudeley Village. What are the reasons for the different scores?

The approach of the Stage 2 study to the assessment of the contribution of land to Green Belt purposes was to consider identified ‘Broad Areas’, specifically for Tudeley BA3 and BA4, south and north of the railway respectively. These are wider areas that go beyond the boundaries of the subsequently selected policy allocation. Whilst the Stage 2 study states at paragraph 5.17 that “*Table 5.2 shows the method for assessing the likely harm to the Green Belt purposes if land within a parcel were released through the Local Plan to accommodate new development*” [emphasis applied], which contemplates the future potential for some or part of the land to be used rather than all of it, for the assessment work itself it is evident that the practitioners have necessarily applied the assessment to the whole of the identified Broad Area rather than to smaller parts of these (refer to the comment boxes for both BA3 and BA4). This is considered to be right approach, as it would not be for the practitioners to predict which parts and how much of the Broad Area parcels might be used.

Accordingly, the subsequent Stage 3 study assessed the actual parcel, so resulting in a different outcome, with lesser effects for the smaller areas as compared to the Stage 2 study outcomes for the Broad Areas. This further assessment, therefore, correctly identifies less harmful effects on the purposes of the Green Belt in terms of ‘checking the sprawl of the large built up area’, ‘preventing neighbouring towns emerging’ and ‘preserving the special character of historic towns’.

Q5. What would be the extent of the harm to the Green Belt if the boundaries were changed in this location as proposed? Are there any ways in which this harm could be minimised or mitigated?

Hadlow Estate’s Green Belt Appraisal, June 2021 and included in the Regulation 19 submission, concludes, as follows:

“8.6 Evidently, the development of the land for Tudeley Village would have a direct effect on the existing Green Belt and impact to some degree on the first three of the five purposes set out at Paragraph 134 of the NPPF [now paragraph 138]. However, the retained Green Belt between Tonbridge, Tudeley Village and Paddock Wood would be clearly and robustly defined and would prevent urban sprawl, neighbouring towns from merging with one another and safeguard the countryside from encroachment, into the long term.

8.7 Furthermore, the range of potential mitigation measures, both within and outside the proposed allocation, and the potential compensatory improvements within

retained Green Belt land should properly be considered as part of the overall evaluation process of the effects on releasing this land from the Green Belt. The ownership position of the Tudeley Village proposal provides a special, near unique opportunity to secure such measures, unlike most urban edge developments in the Green Belt, and these have the potential to substantially reduce the harm to the purposes of the Green Belt, especially the most significantly harmed purpose, Purpose 3 (safeguarding the countryside from encroachment), and to balance/compensate for the residual harm of Tudeley Village on its own, or in combination with the Paddock Wood releases, with a range of benefits to nearby and wider retained Green Belt.”

The Stage 3 Green Belt Study notes a range of measures to mitigate the harm to the Green Belt associated with the release of the allocation site. At paragraph 4.121 it notes that ‘Draft Policy AL/CA1 includes for the provision of appropriate open space; consideration of the landscape characteristics, views and setting of the AONB; provision of higher density of development around the settlement centre and other key points within the development; structural landscaping and buffers around perimeters of the site; and the need to maintain a visual separation between Tudeley Village and Five Oak Green.’

At paragraph 4.122, the study goes on to list other potential mitigation measures which could further reduce the potential visual influence of development on adjacent remaining Green Belt land, and which would help integrate development into the landscape. These are:

- Open space and locally characteristic planting within the allocation site to the east to reduce impact on perceived separation between Tudeley Village and Five Oak Green.
- Open space and locally characteristic planting within the allocation site to the north to reduce the urbanising influence of development across the flat valley floor.
- Strengthen B2017 boundary by enhancing hedgerow planting and introduction of locally characteristic woodland copses and belts.
- Reduce the urbanising effect of development when travelling along the B2017 through use of set-back and appropriately designed road infrastructure to maintain the rural character of the road; and gradation in scale of built form, with lower density development to the periphery and in vicinity of railway and B2017.
- Introduce a village-like character to reduce the perception of being a ‘town’ in respect to Purpose 2, through the application of ‘garden settlement’ principles.
- Reduce urbanising influence on the surrounding landscape by avoiding high-density built development on rising ground to the south and south-west and ensuring new development is designed sensitively with views and local character considered.
- Use of sustainable drainage features to define/enhance separation between settlement and countryside, integrating with the existing pattern of dykes and streams.

At paragraph 4.125, it addresses the draft masterplan for Tudeley Village, which includes ‘a number of measures, which, if implemented in the way indicated, would help to minimise harm’, before listing these measures:

- A secondary school and associated open playing fields, indicated to the east of the site. The latter will help reduce impact on perceived separation between Tudeley Village and Five Oak Green.
- Open recreational space and sports fields indicated to the north of the site on the floodplain. These will help to reduce the urbanising influence of development across the flat valley floor.

- The retention of vegetation (hedgerows and woodlands) within the allocation site, which will help to further reduce the potential visual influence of development on adjacent Green Belt land.
- Proposals to be in keeping with the local area in terms of building types, scale and materials. Building scale will help to reduce the urbanising effect of development, and building form and materials could also help in this respect, if it is able to convey rural character.

The masterplan included in the Delivery Strategy for Tudeley and submitted at the Regulation 19 stage has sought to address these points.

As intimated in the Stage 3 Green Belt Study, the design and style of development at Tudeley Village will minimise harm to the green belt, through the introduction of a village-like character through the application of 'garden settlement' principles, drawing on the Kent vernacular and using scale, proportion, materials and massing in keeping with local development patterns.

Hadlow Estate's Proposed Green Belt Compensatory Improvements are summarised in a discrete document appended to this response. As a single landowner with landholdings beyond the site boundaries, Hadlow Estate is uniquely positioned to propose and deliver Green Belt Compensatory improvements, both on-site and off-site, in a coordinated manner.

Q6. Where it has been concluded that it is necessary to release Green Belt land for development, paragraph 142 of the Framework states that Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. How will this be achieved?

Compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land can be delivered through the application of the Local Plan policy.

The range of compensatory improvements that could be provided by Hadlow Estate are set out in the summary report annexed to this submission. The Estate is well placed to deliver such Green Belt enhancements due the extent of its wider landholding. Hadlow Estate is able to deliver those compensatory improvements where assessed by TWBC under Local Plan policy to be appropriate. In addition to the policy requirements that are set out in the Local Plan for consequential grant of planning permission, requirements to deliver improvements can be formally secured through the Section 106 planning agreement mechanism associated with the grant of planning permission or the use of conditions where appropriate.

Q7. When defining Green Belt boundaries, paragraph 143 of the Framework states that plans should, amongst other things, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. How does the Plan meet this requirement for Tudeley Village?

As described in the response to Q3, the proposed boundaries are clearly defined by physical features which are readily recognisable and likely to be permanent. The proposed release of Green Belt land results in a clear and defensible new boundary to the Green Belt which is defined to the south, south-east and south-west by Five Oak Green Road (B2017); to the north-west by Hartlake Road; to the east by a series of hedgerows and ditches dividing arable fields; and to the north by the extent of flood zone 2. The northern boundary is defined by the flood zone, and so reflects the physical characteristics of the site and

surrounding geography and the flood zone reflects both a permanent and effective boundary.

Section 6.0 of the Hadlow Estate's Green Belt Appraisal, June 2021, provides Hadlow Estate's own independent appraisal of the appropriateness of the revised boundary for the Green Belt in conjunction with the release of the land for Tudeley Village in light of the principles articulated in the Framework. It concludes (at paragraph 6.4) that:

“The suggested revised Green Belt boundary is considered to provide for enough land to meet with TWBC's strategic requirement for the identified need and the boundaries proposed are clear, using physical features that are recognisable and permanent. No land has been included which is unnecessary to keep permanently open or that is safeguarded between the urban area (as yet undefined) and the revised Green Belt boundary.”

Q8. Taking into account the answers provided under Matter 4, do the exceptional circumstances exist at site specific level to justify amending the Green Belt boundary in this location?

Yes. Hadlow Estate is in no doubt that exceptional circumstances do exist at the site-specific level to justify the amendment of the Green Belt boundary in this location and there is a considerable body of evidence supporting this conclusion.

TWBC's own Development Strategy Topic Paper, February 2021, concludes there are exceptional circumstances which justify the release of land from the Green Belt to enable the allocation of the site for development as Tudeley Village. Full detail is provided at Chapter I. Exceptional circumstances for Green Belt releases.

As noted in the response to Q6, the Council has, in addition to the identification of broad exceptional circumstances relevant to development requirements in the borough, identified site and specific development circumstances relevant to the site which include flood mitigation measures, exemplar quality of design, provision of a site for a secondary school, a new Active Travel route to Tonbridge and landscape improvements, and, together with the Paddock Wood allocations, new highway infrastructure. These are listed at paragraph 6.186 of the Development Strategy Topic Paper and reproduced below:

- 'For Tudeley:
 - through the development of the site, and the provision of flood mitigation measures on the wider landholding of the site owner, it is considered that there is the potential to reduce the existing flood risk to areas within Five Oak Green. This requirement is specifically included in the policy, and contributes to the exceptional circumstances for the release of this land from the Green Belt
 - furthermore, the proposal represents an opportunity to deliver development of exemplar design quality, with exceptional permeability and low levels of private car use within the settlement. This requirement is again specifically included in the policy, is considered to make a significant contribution to the exceptional circumstances for the release of this land from the Green Belt;
 - Development at Tudeley also provides a site for a secondary school to meet the needs of the wider area.
 - The site and surrounding land being largely in single ownership enables the scheme to offer a new green route into Tonbridge and improvements to the landscape and accessibility of the countryside beyond the allocation boundary. Full consideration has been given to links both within the allocation

- boundary, and beyond, with inter urban pedestrian and cycle links fully considered.
- Taken together with the expansion of Paddock Wood including in land in Capel parish, there are opportunities to provide significant new highway infrastructure and localised highways improvements.
- The masterplans and detailed design process for Policies STR/SS1 and STR SS3 will create significant open spaces and improve existing, or deliver new, landscape buffers (with built development set back from boundaries) within the new developments to ensure the openness of the surrounding areas remaining within the Green Belt is not unduly compromised (as well as providing areas of amenity space within the allocated areas). Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach.'

Hadlow Estate's Proposed Green Belt Compensatory Improvements report defines proposals for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. Hadlow Estate is uniquely placed to deliver Green Belt enhancements due the extent of its wider landholding.

Mix of Uses and Infrastructure Requirements

Q9. Is it clear to users of the Plan what is meant by the 'provision of employment space' and 'community and leisure facilities'?

Yes, it is clear what is meant by this.

As Policy STR.SS 3 'The Strategy for Tudeley Village' makes clear, Tudeley Village will be a mixed-used settlement designed according to garden settlement principles. These principles are listed at paragraph 5.190 of the Plan and define garden settlements as 'vibrant mixed use communities that support a range of local employment types and premises, retail opportunities, recreational, and community facilities.'

Hadlow Estate has demonstrated its commitment to create a new garden settlement at Tudeley Village which accords with these principles, as can be seen from the Delivery Strategy, December 2020 submitted by Hadlow Estate to TWBC during the Local Plan process to support the allocation of Tudeley Village.

The Estate will ensure that a range of employment spaces and community and leisure opportunities are included in all phases of the development of Tudeley. This is an important part of the process of delivering a mixed-use community, where the dependency on the car is reduced where possible and where opportunities can be created across all of phases of development for residents to be able to work in the community in which they have chosen to live.

These employment opportunities will include:

- Small-scale commercial units, typically seen in a high street and central or local village setting, providing opportunities for retailers, professional services, and other employment types.
- Separate flexible units for small business occupiers, albeit where these activities are suitable for the mixed-use community setting.
- Community halls and places of social gathering.
- Hotels, restaurants, cafes and pubs/bars.

- Healthcare including potential for general practice and dentist surgery.
- Indoor and outdoor leisure provision.
- Pre-school, primary and secondary education provision.

Employment space

Policy STR/SS 3 'The Strategy for Tudeley Village' states that the development strategy for Tudeley Village is to:

'Provide a new settlement which will deliver the following, as identified on Map 32: ...

- b. a main village centre and up to three neighbourhood parades comprising a range of shops, services, and employment uses of an appropriate scale to serve the new settlement: to include community and leisure facilities. The broad locations of the village centre and neighbourhood parades will be defined through the Framework Masterplan, and should be located to maximise accessibility by foot from the new dwellings to serve local shopping needs;
- c. provision of employment floorspace'.

Map 32 shows the proposed locations of the main village centre and three neighbourhood centres.

Users of the Plan can see paragraph 5.222, which states that 'It is anticipated that up to 10,000sqm of commercial and office floorspace within the village centre, and three smaller neighbourhood centres, will be provided...' noting that 'Evidence will be required to demonstrate that the level of floorspace sought within the village and neighbourhood centres does not detract from the vitality and viability of other nearby centres.'

Users of the Plan can see paragraph 5.333, which states that 'Employment opportunities will be created through the provision of workspaces integrated in the village, along with offices, workshops, cafés, and shops, allowing many people to work close to home.'

Documents already submitted by Hadlow Estate during the development of the Local Plan, which are published online by TWBC (Ref: PSLP_1630) illustrate the proposals in this regard. In particular, there is a proposed land use plan on page 41 of the Tudeley Village Delivery Strategy, December 2020 (PSLP_1630-1645). This page describes the proposed total commercial space anticipated at Tudeley Village, as well as its distribution between the village centre and three neighbourhood centres and anticipated split between retail and office space. Page 42 of the same report includes a table which describes the anticipated phasing of employment space.

Community and leisure provision

Policy STR/SS 3 'The Strategy for Tudeley Village' states that the development strategy for Tudeley Village is to:

'Provide a new settlement which will deliver the following, as identified on Map 32: ...

- b. a main village centre and up to three neighbourhood parades comprising a range of shops, services, and employment uses of an appropriate scale to serve the new settlement: to include community and leisure facilities. The broad locations of the village centre and neighbourhood parades will be defined through the Framework Masterplan, and should be located to maximise accessibility by foot from the new dwellings to serve local shopping needs;'

Map 32 shows the proposed locations of the main village centre and three neighbourhood centres.

Users of the Plan can see paragraph 5.224, which states that: 'Community facilities are considered an integral part of the vision for Tudeley Village, with the provision of both a primary and secondary school, community hall, village green, health facilities, and playing fields.'

Again, documents already submitted by Hadlow Estate during the development of the Local Plan, which are published online by TWBC (Ref: PSLP_1630) illustrate what is proposed. The table on page 42 of the Tudeley Village Delivery Strategy, December 2020 (PSLP_1630-1645), describes the anticipated provision of community and leisure uses and phasing for their delivery. Text on pages 42 and 43 of the Delivery Strategy describes the proposed community and leisure provision in more detail.

What is expected of applications for planning permission?

See answers above. Applications for planning permission will include a quantum of non-residential floor space which will be specified in a supporting Design and Access Statement. This will set out the nature of the spaces including a breakdown according to use class and type of employment generation.

Q10. Does the Plan support an appropriate mix of uses across the site to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities, as required by paragraph 106 of the Framework?

Yes. Employment, shopping, leisure, education and other activities are distributed across the development in a village centre and three neighbourhood centres, as described in Map 32 of the Submission Local Plan.

The plan for Tudeley Village is designed to minimise the number and length of journeys needed for these uses. Detail of delivery of this in practice is provided on pages 44-48 of the Tudeley Village Delivery Strategy, which has been submitted to TWBC as evidence to support the allocation of Tudeley Village in the Plan. It can be seen from this how most homes are proposed to be within a five-minute walk of a neighbourhood centre and within a ten-minute walk of the village centre – see the illustration on page 44 of the Delivery Strategy.

Further evidence is provided in the 'Tudeley Garden Village Regulation 19 Submission – Transport Assessment', prepared by WSP in May 2021 and submitted to TWBC as part of the Tudeley Village evidence base,

Q11. How will the phasing of development be controlled and is it clear to users of the Plan what new infrastructure will come forward and when? Is it necessary for such information to be contained in the Plan?

As described in Policy STR/SS 3:

'The development will be delivered through the production of a Framework Masterplan Supplementary Planning Document (SPD) to guide development in respect of the garden settlement principles and creation of a new community at Tudeley Village. The SPD will set out broad principles to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site and will set out the phasing for delivery of the key elements and associated infrastructure. The SPD will need to ensure all elements of the proposals are considered comprehensively, following a masterplan approach. Proposals for the

piecemeal development of individual sites/elements within the settlement without the comprehensive masterplan approach will not be supported.'

The proposed phasing trajectory is aligned with the programme anticipated by TWBC's Phasing and Build-out Rate methodology, as described in the Housing Supply and Trajectory Topic Paper for Pre-Submission Local Plan, February 2021, at paragraph 5.29.

Users of the plan can refer to Policy STR5 Infrastructure and Connectivity, which states that: 'For the identified strategic sites where the provision of a range of significant infrastructure projects are required to mitigate the impact of development to particular areas, the delivery of this will be agreed through a masterplanning process'. Phasing will be controlled by the Framework Masterplan SPD.

Users of the Plan can also see TWBC's Infrastructure Delivery Plan (IDP) which, according to Policy STR5, 'identifies the scope of infrastructure to be provided, the phasing of such infrastructure linked to the planned development, and the mechanisms by which the Council considers that the infrastructure will be delivered, including the use of Section 106 agreements, infrastructure levy, or equivalent policy as applicable'.

The IDP should also be read in conjunction with the Strategic Sites Masterplanning and Infrastructure Study, February 2021, which has been prepared by David Lock Associates for TWBC in relation to the two Strategic Sites proposed in the Local Plan at Paddock Wood and east Capel, and Tudeley Village. Pages 131-135 of the Strategic Sites Masterplanning and Infrastructure Study 2021 detail the infrastructure requirements and phasing anticipated for development both of Tudeley Village and Paddock Wood/east Capel, while pages 142-143 detail the infrastructure requirements and phasing anticipated for Tudeley Village only,

Is it necessary for such information to be contained in the Plan?

No. Hadlow Estates does not consider it is necessary for additional information to be included in the Plan in light of the detail summarised above.

Highways and Transport

Q12. What impacts will the cumulative level of growth proposed in the Plan have on the B2017 between Tudeley and Tonbridge?

Q13. How will the impacts of development be mitigated along the B2017 up to and including the junction with the A26? Are the measures proposed deliverable and will they be effective?

In response to Q12 and A13, these are principally matters for the Council. Relevant highway, bus and cycling measures in respect of Tudeley Village are summarised below. For measures involving land owned by the Estate, the Estate clearly has the ability to make such land available to facilitate delivery of improvements.

Q14. Are the projections regarding future transport patterns reliable and are the conclusions robust? Do they justify the proposed allocation Tudeley?

Are the projections robust?

Yes. The projections regarding future transport patterns are robust and take a cautious approach to issues of transport impact and mitigation arising from the proposed strategic development sites.

Do they justify the proposed allocation Tudeley?

Yes. The sustainable travel opportunities for Tudeley are noted in the Sweco Report and the WSP report submitted by the Estate at Regulation 19 stage; improved bus routes, bus priority and cycling are planned as well as a primary and secondary school, employment and local retail embedded within the development which will ensure the internalisation of car trips where possible. While there will still be congestion at some junctions in the Future Local Plan scenarios, that is not a consequence of the Tudeley allocation and there is no indication from the modelling that the Tudeley allocation on its own will result in capacity (let alone severe capacity) or safety consequences post-mitigation.

Q15. How will connectivity with Tonbridge be provided for non-car modes of transport?

The Council can no doubt comment on the various public transportation measures proposed, and these are also documented within the WSP report included as part of the Estate's Regulation 19 submission.

In addition to the enhancements to bus service provision, the opportunity has been identified to deliver a dedicated public transport route from the B2017/A26 junction into Tonbridge via Tudeley Lane (which is currently stopped up). This would therefore facilitate a dedicated bus route which would improve journey times into the town centre/ train station, compared to times by private car. This is illustrated in the WSP report annexed to the Estate's Regulation 19 stage submission. The Estate will facilitate the delivery of this improvement where it incorporates Estate land.

A dedicated cycle route has also been proposed by Hadlow Estate between Tudeley and Tonbridge, and this is described in the Green belt Compensatory Improvements report provided in answer to Q5 and Q6 above. This would create a link between other connecting cycle routes to the west, and potentially the east of Tudeley. This dedicated cycle route would be developed by Hadlow Estate on land entirely within their ownership and is fully deliverable. A plan showing this route and how it would connect is illustrated below.

Q16. What is the justification for the proposed link-road to the east of the allocated site, running from the B2017 to the proposed Colts Hill bypass?

Again, this is a matter the Council and its advisors can comment upon in more detail. Hadlow Estate understand the intention is to provide some traffic alleviation through Five Oak Green which includes potential traffic calming measures in the village as well as the link road.

We consider that the proposal for the link road is based on a cautious approach to issues of transport impact and mitigation arising from the proposed strategic development sites.

Q17. How will the link road be delivered and is it viable? Is it required for the strategic site at Tudeley alone, or, as a result of cumulative growth with sites at Paddock Wood and east Capel?

Again, this is a matter for the Council, but Hadlow Estate understand the new link road would be delivered by TWBC with funding contributions sourced from all strategic developers based on assessed impacts from these developments.

Q18. Is the location of the proposed link road justified, taking into account land use constraints, flooding, the character and appearance of the area and proximity to the Capel Primary School?

Again, this is principally a matter for TWBC, but Hadlow Estate consider that the route shown is a logical route.

Q19. Is the evidence supporting the Plan reliable and robust? Does it take into account the indicative location of the proposed secondary school?

Yes, the evidence supporting the Plan is reliable and robust. It does take into account the indicative location of the proposed secondary school. We consider that the Council's and the Estate's own analysis support the conclusion that the Tudeley allocation is deliverable without severe detrimental impact to the highway network, and with appropriate and deliverable mitigation measures proposed.

As noted in 'Traffic Note 5' (October 2020), prepared by WSP for Hadlow Estate and submitted to TWBC during the Local Plan process, the indicative location of the proposed secondary school has been considered. With the full range of education facilities proposed to be provided on site, this will reduce the need for travel away from the site for this journey purpose. As a conservative estimate, it has been assumed that 90% of education trips would occur on site. Of these journeys, having regard to the National Travel Survey Table 0613, it would be expected that more than 55% of these trips would take place by non-car means, with the remainder involving a vehicular journey as part of an onward journey. There would be the opportunity to further reduce the level of education trips involving a vehicular journey as part of the Travel Plan process.

Viability and Deliverability**Q20. Is it clear to decision-makers, developers and local communities what infrastructure will be delivered, by whom and when?**

Yes, it is clear to decision-makers, developers and local communities what infrastructure will be delivered, by whom and when.

The Strategic Sites Masterplanning and Infrastructure Study 2021 was prepared in relation to the two Strategic Sites proposed in the Local Plan at Paddock Wood and east Capel, and Tudeley Village. This is published as one of the core evidence documents produced by TWBC to inform the preparation of the Local Plan. It contains information on the required infrastructure and a high-level programme for its delivery.

The Strategic Sites Masterplanning and Infrastructure Study 2021 refers to potential sources of funding for the provision of infrastructure, including funding from development through a combination of Section 106 and Section 278 agreements plus the possibility of some form of Infrastructure Levy (if the Council decides to pursue this option), as well as funding from infrastructure providers and statutory agencies. The Study refers to TWBC's Infrastructure Delivery Plan and notes that it will be updated if necessary alongside the Examination of the Local Plan to 'firm up the requirements, timescales, associated costs etc'.

Appendix 1 of the Infrastructure Delivery Plan (IDP), March 2021, contains an Infrastructure Delivery Schedule which describes the type, project, priority, risk, timing, delivery body, indicative costs and funding position of infrastructure required to deliver the Local Plan.

As noted in paragraph 1.2, the IDP is published as a ‘live document’, updated to reflect relevant changes in information... further changes may be required as a result of further updates and information from service providers and progress with the production of the Local Plan. As such the Infrastructure Delivery Schedule in Appendix 1 may be updated to reflect such further changes.

Q21. What is the justification for requiring a Supplementary Planning Document (‘SPD’)?

This is principally a matter for TWBC which has identified that it considers an SPD to be the most formal and inclusive approach to the development of a masterplan for Tudeley Village. If an SPD is retained as a requirement, Hadlow Estate will work on that basis. Hadlow Estate would equally be content to proceed directly to a planning application (with the consequential consultation processes that entails).

Q22. Based on the necessary infrastructure requirements, is the allocation viable?

Absolutely. This has already been subject to assessment and evidence.

As noted in paragraph 4.92 of the Submission Local Plan, under the heading ‘Infrastructure and Connectivity’, the Council has undertaken a ‘Whole Plan’ Viability assessment and an assessment of the viability of the strategic sites (including Tudeley Village). The conclusion of this study is that the policies in the Local Plan are viable.

In February 2021, a Strategic Sites Masterplanning and Infrastructure Study was completed by Dixon Searle Partnership (DSP). The purpose of this document was to gather evidence on whether specified scales of development at the locations identified in the DLP [Draft Local Plan] are deliverable from a masterplanning, infrastructure and viability perspective.

The Assessment considers eight scenarios for development at Tudeley Village, which are all based on the delivery of 2,800 residential units with 40% affordable housing (aligned with the Local Plan’s requirement for 40% affordable housing at greenfield development) and vary in the assumed Average Market Value (£/m²), Benchmark Land Value (£/ha) and Developer Return (%). These are summarised in a table at Figure 6 in the report.

In reviewing these scenarios, the assessment notes at paragraph 3.2.7 the ‘strong local market and an attractive, convenient location available to support the prospects [of development at Tudeley Village]’, and at 3.2.10 the ‘strong place-making potential... which should reflect positively in the values generated and further support the prospects for viable development overall [at Tudeley Village]’.

In summary, it finds that:

Para 3.2.12: ‘Therefore, our conclusion from the perspective of the viability assessment work is that we consider the criteria of the NPPF can be met with these two strategic development allocation scenarios [Tudeley Village and Paddock Wood] included as part of the new Local Plan’.

Hadlow Estate confirms that it considers the delivery of the allocation with the necessary infrastructure requirements to be viable.

Landscape and Heritage

Q23. The AONB Setting Analysis Report identifies areas of ‘high’ and ‘medium’ sensitivity within the allocated site. In the area of high sensitivity, the Report states that development without mitigation is likely to harm the setting of the High Weald AONB. How is this reflected in the Plan? What potential impacts will the allocation have on the setting of the AONB?

Addressing the last question first, the allocation would have limited effects on the setting of the AONB both in respect of the degree of the effects and, importantly, the extent over which those effects would be appreciated from within the AONB, this being highly restricted to only several fields at the boundary of the AONB. Furthermore, the effects in this area would be capable of being mitigated with suitable landscape mitigation, as identified in the Hadlow Estate’s Landscape and Visual Appraisal for Tudeley, June 2021. As to views of the AONB from outside of the AONB, principally from within the Medway Valley, and to the extent that this might be considered to be an element of the setting of the AONB, the allocation would be seen largely in the middle distance, on the rising ground beyond the flat floodplain, partially concealed by intervening vegetation and woodland on the allocation itself, but below the rising wooded slopes and horizon of the AONB beyond. Again, landscape mitigation would assist in moderating the visual change.

The AONB Setting Analysis Report sets out a high-level assessment of likely effects on the setting of AONB in the absence a specific detailed scheme. It refers to a high level of sensitivity that requires mitigation but noting that this is below the Very High sensitivity category. It refers to an approach to that mitigation, but due to the limitations of there being no detailed scheme for consideration at that time, it did not take that mitigation into account in its conclusions. It concludes that “*If these measures are undertaken [i.e. the indicative measures] it is possible that the proposed allocation could be achieved without significant harm to the setting of the High Weald AONB*”.

The Hadlow Estate’s Landscape and Visual Appraisal for Tudeley, June 2021, considers the issue of setting of the AONB and the potential effects of the development on it. It goes further than the Council’s landscape report and defines specific, albeit indicative mitigation measures and undertakes landscape and visual assessments at 15 years, with mitigation included. It concludes, in respect of setting, that it is “*evident that some development at the site would be experienced from within the AONB, due primarily to its proximity to some close views, and that some development would be seen within the context of views from outside of the AONB, to the AONB, i.e. those identified from within the site itself and from the Medway Valley to the north. Accordingly, the site forms part of the setting of this part of the AONB*” (paragraph 7.5). It goes on at paragraph 7.6:

“*However, whilst being in the foreground of views out from the AONB, the assessment has demonstrated that the opportunity to view parts of the potential development from publicly accessible locations from within the AONB would be highly limited. The assessment also considers that the visual effects on receptors at these locations would be capable of being moderated through suitable mitigation proposals, based around the indicative ones illustrated, and, consequently, in respect of views out of the AONB, the adverse effects on the setting of the AONB are also capable of being moderated to the degree required in the HDA report*” [i.e. the Council’s landscape report].

Q24. How will the allocation ensure visual and physical separation between Tudeley Village and Five Oak Green?

The policy wording requires the design of the scheme to ensure “*appropriate visual separation*” between the two settlements, including the use of structural planting outside of the allocation.

The Hadlow Estate’s indicative landscape and Green Belt mitigation/enhancements identify the scale and location of a new Community Woodland on Estate land between Tudeley and Five Oak Green. The Hadlow Estate’s Landscape and Visual Appraisal for Tudeley, June 2021, identified that intervisibility between the two communities would be likely to be limited due to intervening vegetation based on an assessment from an elevated viewpoint located at the edge of Five Oak Green (viewpoint 6), and concluded that mitigation is not an important consideration in this view. However, for the purpose of reinforcing the perceived sense of separation, for Green Belt as well as general landscape and visual reasons, the Community Woodland, in combination with open space uses related to the secondary school, would provide a robust and permanent landscape buffer between the settlements.

Q25. What potential impacts will the proposed allocation have on the significance of designated heritage assets, having particular regard to the Grade I listed Church of All Saints’ and Grade II listed buildings at Bank Farm and Lilley Farm? How have heritage assets been taken into account in the preparation of the Plan?

The masterplan for Tudeley Village respects the designated heritage assets within the site and near to it and has been designed to reduce and where possible eliminate entirely any harm to the significance of these assets. Hadlow Estate has appointed Orion Heritage to provide heritage advice to support the planning of Tudeley Village, and this advice is consolidated in two reports which have been submitted to TWBC to support the allocation of the Tudeley Village site: a Heritage Constraints Appraisal, October 2019 and an Archaeology Desk-Based Assessment.

Orion Heritage concludes that there are six key potential heritage constraints that will require a design response in order for the delivery of the proposed new settlement to be achievable in heritage terms.

These are:

- The grade I listed Church of All Saints’ and nearby listed buildings
- The listed buildings at Bank Farm and Lilley Farm in the centre of the study site
- The listed buildings present along the southern boundary of the study site, along Five Oak Green Road
- The listed buildings in Tudeley
- The listed buildings at Tudeley Hale
- Views from Somerhill house and park

The above constraints were carefully considered and it was found that, provided adequate design responses are provided for within the proposed new settlement, it would be possible to deliver the development while:

- Preserving the significance of the Church of All Saints’, Somerhill House and registered park and the buildings in Tudeley and Tudeley Hale.
- Keeping any residual harm to the listed buildings at Bank Farm, Lilley Farm and those present along the southern boundary of the study site on the Five Oak Green

Road to a low level of less than substantial harm, with the potential to avoid harm and/or provide enhancements in some instances depending on the detailed designs eventually developed.

This will be achieved by implementing the following design responses:

- An iterative design approach, which will seek to engage with key heritage stakeholders to ensure that key constraints are understood and adequately responded to in the proposed designs.
- Retention of open space and screening along the western boundary of the study site to protect the setting of the Church of All Saints', the Somerhill registered park and the listed buildings in Tudeley and Tudeley Hale.
- Retention of open space and screening in the south-eastern boundary of the study site to protect the setting of the George and Dragon Cottage and Tatlingbury farmstead.
- Careful design responses in the settings of Bank and Lilley Farmhouses and the Bank Farm Oast, to ensure their contextual relationship remains legible and that development here seeks opportunities to provide enhancements.
- Careful design responses to the settings of the listed buildings along the southern and northern boundaries of the study site.

The remaining designated heritage assets in the surrounding area were also appraised and it is not considered that these would constrain the delivery of the proposed new settlement. However, they would still require assessment and consideration as the proposed settlement design is developed further and in any future planning application.

Based on the above, it is considered that it has been demonstrated that the proposed new settlement can be delivered on the study site without resulting in unacceptable harm to the designated heritage assets within the study site or in the surrounding area.

The masterplan was amended in response to the Orion Heritage assessment, as evidenced in the Delivery Strategy published by Hadlow Estate in December 2020. A generous green buffer is planned between All Saints' Tudeley and new neighbourhoods at Tudeley Village, which will protect the setting of the church through the retention of open space and provision of screening planting. A careful design response at Bank Farm and Lilley Farm will help to preserve the significance of these heritage assets (acknowledging that some change to the setting is unavoidable given their central location within the site), with open space and key views between the two sites preserved where possible to retain some understanding of their group value and historic role.

Other Material Planning Considerations

Q26. Does any of the proposed allocation fall within areas at risk of flooding, taking into account all sources of flood risk and climate change?

The vast majority of the site is located within Flood Zone 1, with only small areas of land close to the northern boundary of the site being located in Flood Zone 2. Evidence prepared by WSP and presented by Hadlow Estate to support the allocation of Tudeley Village shows that flood risk and drainage can be successfully managed as part of the proposed development for the site, subject to appropriate masterplanning and design solutions being implemented. This evidence is published online by TWBC at the Pre-submission Local Plan consultation comments, document PLSL_1630-1645_Turnberry for Hadlow Estate_SI-4_A-3_Flood Risk Review.

Q27. Map 32 of the submission version Local Plan shows a ‘potential train station site’ within the allocation. What is the latest position regarding the potential for a new station at Tudeley Village? Is it a requirement of the allocation?

A rail station is not required for the delivery of Tudeley Village, and at this time, we understand from TWBC that Network Rail does not consider there is merit in providing a station in this location. However, given the long-term nature of the project, it is sensible and appropriate for the Estate to keep open the opportunity for a rail station to come forward if Network Rail’s views change in the future.

On this basis, it is appropriate that the Tudeley Village Masterplan enables a potential station to be accommodated in the future and ensures the development does not preclude this opportunity.

Please also see the Annex to this Submission – Green Belt Compensatory Improvements to support the development of Tudeley Village, dated May 2022