

Royal Tunbridge Wells Town Forum response to the Inspector's questions in relation to Stage 2 Matters Weeks 2 and 3

Introduction

Formed in 2005, the Royal Tunbridge Wells Town Forum is the voice of some 50,000 residents in the unparished town of Royal Tunbridge Wells. Supported administratively by TWBC in lieu of a formal Town Council, it comprises some 50 local residents' associations and community interest groups and its meetings are also attended by borough and county councillors for town wards.

Besides regularly submitting comment on strategic planning issues affecting the town, in 2016 the Town Forum submitted a 15 page response to TWBC's initial Call for Sites. This was followed with a 43 page response to the Call for Sites Consultation held between 2 May and 12 June 2017 and a 68 page response to the Regulation 18 Consultation held between 20 September and 1 November 2019. Finally, the Inspector will find Town Forum responses to over 60 draft policies under the Regulation 19 Consultation in the TWBC New Local Plan database.

Hearing Day 4 25th May Matter 2 Housing and Employment Needs STR 1

Issue 1 Housing Needs

Question 5: Do Green Belt/AONB policies provide a strong reason for restricting the scale of development in Tunbridge Wells?

Yes, as is assumed under the NPPF.

Question 6: Is the housing requirement justified, having particular regard to the Green Belt/AONB?

The housing requirement is not justified in our view, firstly because it is based on pre-Brexit 2014 evidence and overall housing need has subsequently diminished, but TWBC has been forced to use the 2014 figures. It is also not justified because the figures should have been adjusted to take proper account of the preponderance of AONB and Green Belt land in the Borough which should act as a constraint on development. We are aware of the national political pressures which have weighed heavily on TWBC in favour of a more liberal interpretation of the NPPF at the expense of the Green Belt.

Issue 2 Affordable Housing Need

Question 1: should the need for affordable housing be clearly set out in the plan?

Yes, the need should be clearly identified and set out in the plan. It makes up around half of total identified need but it is of little or no interest to would-be developers. This is again a national political problem which affects TWBC, as the creation of the necessary proportion of affordable social housing depends on the provision of public finance in one way or another which is not available to TWBC.

Question 3: Based on thresholds in policy H3, will affordable housing need be met?

While we strongly support TWBC in its endeavours to secure the maximum possible provision of affordable and social housing through plan requirements, it seems inevitable that the present structure for housing provision by the private sector will fail to deliver the quantity of such housing that is actually required in Royal Tunbridge Wells.

Issue 3 Employment Needs

Question 8: Will there be sufficient labour to fill local jobs or will it lead to commuting from elsewhere?

This is a highly relevant question to which no satisfactory answer has been forthcoming. Demographic data suggest that there is already an abnormal absence of population in the 20-30 age range in Royal Tunbridge Wells which is needed across a range of employments at modest skills levels and in junior positions in banks, building societies and public services, including TWBC. There is already substantial commuting of these populations from places like Hastings, Heathfield, Edenbridge etc, which will only worsen unless the appropriate kind of housing is provided in Royal Tunbridge Wells for these working populations and not the high value market housing which naturally attracts developers. Some of the town's traffic congestion problems stem from the present housing imbalance and these may be expected to worsen.

Hearing Day 5, 26th May Matter 3 Spatial Strategy

Issue 1 Spatial Strategy

Question 6: 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)?

We would argue that this statement has been taken somewhat out of context and/or is inaccurate or ambiguous, as the land to the West and North of Royal Tunbridge Wells is in fact either in the AONB or is Green Belt which is buffer to AONB and of significant landscape value in its own right as part of the High Weald, some of it also adjoining the Historic House and Gardens at Salomons Estate on the southern edge of Southborough.

The question could be read as suggesting that the situation to the W and N of RTW is more favourable than for the standalone settlement if one interprets the word "also" to suggest that Green Belt loss would not be necessary in RTW but would be necessary for the standalone settlement. This is not the case.

Question 7: 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?

If our conviction should be dismissed that housing requirements for the Borough are excessive in any case (and also in view of AONB and GB constraints), then it is our view that excess housing need could have been provided by development of a Garden Town based on the existing settlements at Staplehurst and Headcorn (both in neighbouring authorities) and Frittenden, all being outside the GB and AONB. This would be served by two existing main line stations making it particularly sustainable. However, the planning system is based on a Call for Sites and no land of substance was promoted at Frittenden and that made it effectively inaccessible for further study by an under-resourced medium tier authority unable to promote a major scheme based on compulsory purchase. This may be regarded by some as most regrettable, but seems to us another of the present major deficiencies in the national planning system.

Question 8: 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

It is our contention, as expressed in our hearing statement for Week 1, that housing needs could indeed be met in a way which does not require land to be removed from the GB in RTW. This could be achieved by bringing forward redevelopment of underutilised land in the town and by requiring higher density development of sites proposed for allocation.

Question 9: 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?

Yes, for the reasons already set out above.

Issue 2 Distribution of development

Question 8: Does the Plan identify any areas of safeguarded land, in between the urban area and the Green Belt in order to meet longer-term development needs stretching beyond the plan-period?

The Plan does not do so in relation to Royal Tunbridge Wells. If the Inspector should be minded to delete the Green Belt Allocations at AL/RTW5 and AL/RTW16, there may be a case for considering whether there are areas within the present Green Belt boundary which would warrant being safeguarded for long term potential development after the end of the present Plan period should no other developable land within limits to built development then be available.

Hearing Day 6, 27th May Matter 4 Principle of Green Belt Release

Issue 1 Principle of Green Belt Release

Question 3: Does the plan use Brownfield and underutilised land?

The plan does use Brownfield land but in our hearing statement for Stage 1 we showed the extent to which underutilised land in Royal Tunbridge Wells has not been exploited so as to create a more dense and vibrant town without needing to sacrifice AONB or Green Belt land.

We also acknowledged that, perhaps culpably, the present planning system militates against the use of underutilised land because it requires much more effort to amalgamate land holdings and persuade landowners to bring land forward. This should be a key role for planning policy officers, but we recognise the staffing constraints and the existing national planning constraints that have deterred them.

Question 4: Can housing needs be met by optimising the use of previously developed land and buildings without requiring land to be released from the Green Belt?

We believe housing need in RTW could be thus met, including by bringing back into residential occupation a myriad of empty storeys above town centre shops. However, the issue of guaranteed deliverability again raises its head to prevent this to the extent required to prove “soundness” of the plan

Issue 2 Green Belt methodology

Question 3: What was the purpose of the *Green Belt Study Stage 3*? Did it build upon the findings of the earlier studies, or, assess proposed site allocations?

It seemed more directed to consideration of proposed allocations. In the case of Caenwood Farm, the insertion was so late in the day following rejection of the site in Stages 2 and 3 that this proposed new allocation (upon which there was no consultation under Regulation 19) was not even given an allocation number of AL/RTW 5 in the stage 3 report!

Issue 3 Exceptional Circumstances

Question 1: At a strategic level, do exceptional circumstances exist to alter the Green Belt boundary, having particular regard to paragraphs 140 – 143 of the Framework? If not, how could housing and employment needs be met in other ways?

We do not believe that exceptional circumstances have been demonstrated in relation either to proposed residential allocation AL/RTW 5 or AL/RTW 16. However, we came reluctantly to the view that provision of potential new light industrial and business land for employment in the vicinity of the towns of Royal Tunbridge Wells and Southborough may not be possible other than through loss of GB/AONB land as in the proposed allocation at AL/RTW 17 Longfield Rd and that exceptional circumstances may exist in that situation.

Hearing Day 9, 16th June Matter 8 Meeting Housing Needs

Issue 1: Housing mix

Question 1: Is it sufficiently clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy H1?

We are concerned that private developers are still tending not to build the type of housing needed to meet Objectively Assessed Need in the Borough, with a preponderance of large detached dwellings on recent Greenfield sites in Royal Tunbridge Wells, some just over the border in East Sussex. Proposed Policy H1 will still be too weak to put a check on this.

Issue 2 – Housing Density

Question 2: How does the Plan seek to optimise the use of land for development in town centres and other locations that are well served by public transport?

We strongly supported the earlier wordings in the Regulation 18 draft but consider the present version has been watered down. Given the acute shortage of suitable land for meeting identified housing need in Royal Tunbridge Wells, it is essential to seek a significant uplift in the average density of residential development in and around the town to that appropriate in an urban rather than suburban setting. This will be the only way in which to build the sustainable communities of the future and to avoid suburban sprawl.

Land should be used in a more efficient manner than currently proposed, as required by paragraph 123 of the NPPF, in order to obviate or minimise the need for use of Greenfield sites, particularly in the Green Belt and AONB. This should apply both to any redevelopment of existing urban areas and to any Greenfield land which may be allocated for residential development.

Issue 3 – Affordable Housing

Question 1: What is the justification for requiring 40% affordable housing on qualifying greenfield sites and 30% on qualifying brownfield sites in Policy H3?

This policy seeks to address the most pressing housing need in the Borough and reflects policies which the Town Forum has been advocating for several years. There is a clearly established housing need for the 40% requirement for affordable housing on development sites of which 60% would be at social rent. It would be preferable also to see a 40% or higher requirement on brownfield sites in existing town centres.

Question 5: What is the justification for requiring a minimum of 50% of the affordable housing to be delivered on-site prior to completion of 50% of the open market units approved? Is this viable and deliverable?

This would tend to achieve satisfaction of predicted housing need in a balanced way and preclude retrospective applications to reduce affordable housing provision on a site or to delay it until the end of site delivery.

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

Issue 1 Royal Tunbridge Wells and Southborough

AL/RTW16 – Land West of Eridge Road and Spratsbrook Farm

Question 13: Do exceptional circumstances exist to alter the Green Belt boundary in this location, having particular regard to paragraphs 140 – 143 of the Framework?

It is our contention that exceptional circumstances do not exist to justify current proposals for allocation of land at Spratsbrook Farm. Predicted housing needs in RTW could be met in a

way which does not require land to be removed from the Green Belt at Spratsbrook Farm. This could be achieved by bringing forward redevelopment of underutilised land in the town and by requiring higher density development of sites proposed for allocation, both of which are required in the 2021 version of the NPPF which post-dates the Draft Local Plan.

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?

Proposed development is neither appropriate nor justified because it is our contention that exceptional circumstances have not been demonstrated to allow this land to be removed from the Green Belt.

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

It will not be reasonably practicable to widen Speldhurst Road and to retain the trees along the site frontage without compulsorily purchasing and demolishing most of the Victorian housing on the other side of the road, which is clearly out of the question. The retention of the tree cover was one of the determining factors in attempting to justify the proposed allocation.

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?

It is our contention that exceptional circumstances do not exist to justify current proposals for allocation of land at Caenwood Farm. Predicted housing needs in RTW could be met in a way which does not require land to be removed from the Green Belt at Caenwood Farm. This could be achieved by bringing forward redevelopment of underutilised land in the town and by requiring higher density development of sites proposed for allocation, both of which are required in the 2021 version of the NPPF which post-dates the Draft Local Plan.

Hearing day 11, 21st June Matter 7 continued

AL/RTW19 – Land North of Hawkenbury Recreation Ground

The Town Forum supports the answers to the Inspector's questions and contribution to debate of the Royal Tunbridge Wells Civic Society relating to this site.