

Mr M. Birkinshaw BA(Hons) MSc MRTPI
C/O Banks Solutions
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10th May 2022

Dear Mr M. Birkinshaw,

Examination of the Tunbridge Wells Borough Local Plan – Response to Matter 7 (Issue 1 - AL/RTW5 – Land South of Speldhurst Road and West of Reynolds Lane)

CBRE is instructed by Dandara in respect of their land interests within the Tunbridge Well Borough Local Plan (hereafter ‘the Plan’). With specific reference to the proposed allocations within the Plan their interest includes:

- **STR/PW1 / STR/SS1 – Badsell Farm, Paddock Wood (‘Paddock Wood’);**
- **STR/HA1 / AL/HA4 – Land off Copthall Avenue and Highgate Hill, Hawkhurst (‘Hawkhurst’);**
- **STR/RTW1 / AL/RTW5 – Land at Speldhurst Road, Southborough (‘Southborough’).**

Dandara also hold interest at **AL/RTW16 – Land to the West of Eridge Road at Spratsbrook Farm (‘Spratsbrook Farm’)** and representations in respect of this site are submitted by Barton Willmore.

Dandara also have interest in the Land East of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road (‘Sissinghurst’) which for the purpose of the Plan is an omission site.

Dandara’s interest within Land South of Speldhurst Road and West of Reynolds Lane is in relation to part of the allocation (refer to appended site plan). Whilst Dandara does not control the whole allocation, through the promotion of the site as part of the Local Plan process Danadara and its consultants have been in regular dialogue with the adjacent landowner and their consultant team.

Response to Matter 7, Issue 1, Questions 27 and 28 – Land South Of Speldhurst Road and West of Reynolds Lane

Q27. How has the scale of proposed development been determined and is it appropriate and justified in this location?

Q28. 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 scale of the proposed development at 100 units is broadly consistent with more detailed technical work that Dandara has commission in respect of the site and is appropriate for a plan making process (appreciating that detailed evidence collated to support the planning application process may be able to deliver slight advances on this). Our Regulation 19 submission (REF ID - 91a-d) included an indicative masterplan for the site and should provide the

Inspector with the confidence that the broad number of units indicated by the allocation are achievable on site whilst respecting the key objectives and requirements of the allocation itself.

The Development Strategy Topic Paper (2021) - **CD3.126** – identifies Southborough as being part of the Royal Tunbridge Wells Main Urban Area. This is the where the availability and access to goods and services is greatest and where, in accordance with the NPPF (2021) development should be prioritised. In respect of whether the proposed location is justified, the assessment undertaken in the Sustainability Appraisal (**3.130a**) demonstrates the sustainability credentials of the site when considered against alternatives.

The site is approximately a 20 minute walk to High Broom Station. The site is also close to the services and amenities that are directly served off of the A24 including education and sporting provision. The A24 is the main transport corridor into Tunbridge Wells and is served by regular, existing services. For the reasons set out above there is no doubt as to the soundness of the allocation in terms of it being a justified and appropriate location for residential development.

Question 28 is predominately for the Council to respond to. We would draw the Inspector to our response provided in Matter 5. Whilst, in principle, the use of the schematic diagram is useful in establishing broad principles through which more detailed pre-application discussions can occur, it is important that their inclusion does not artificially constrain the design process at a later date. It is important to note that the level of evidence to support a proposed allocation is proportionate to the local plan process and thus would not be expected to delve into detailed matters that would inform the overall distribution of development. We suggest that a supporting paragraph/ sentence is added into the local plan to make it clear to the readers and future uses of the local plan that the schematic diagrams represent a starting point for considering the broad issues of relevance to any one particular allocation but it will be through the planning application submission process to further test and, where appropriate, refine these assumptions.

Response to Matter 7, Issue 1, Questions 29 and 30 – Land South Of Speldhurst Road and West of Reynolds Lane

Q29. Is it necessary to widen Speldhurst Road in order to facilitate the proposed development? Is it sufficiently clear to users of the Plan what highway improvement works are required?

Q30. Will it be possible to widen Speldhurst Road and retain trees along the site frontage?

On the 17th September 2021 a pre-application meeting was held with Kent County Council to discuss the principle of the site as it related to the ability to achieve a suitable access. A series of minutes were produced and agreed as being accurate by KCC on 17th December 2021. We can confirm following discussions with KCC that widening is required, although the discussions with KCC have made clear that this is only needed for a very limited area around the proposed site access to allow for the turning of the refuse vehicle.

With respect to tree loss, given the very limited widening agreed with KCC this should be possible without losing any trees that would not already be removed as part of the access. The access location was selected to be in a location which minimises the impact on trees and particularly the higher quality ones. More detailed arboricultural work that has been undertaken to support the necessary highways works has indicated that approximately 6 trees will need to be removed to facilitate the proposals. The trees have the following characteristics:

- 1 Category U tree
- 3 Category C trees
- 2 Category B trees

In light of the above we are minded to agree with the Inspector that the Point 2 of the allocation as drafted ‘Possible widening of the section of Speldhurst Road that runs adjacent to the site, and the provision of an appropriate level of parking for existing residents within the site itself’ infers a greater level of intervention than is required to deliver the allocation. As set out above, any widening would be localised to the provision of the access into the site and thus is more appropriately captured in Point 1.

Response to Matter 7, Issue 1, Questions 31 – Land South Of Speldhurst Road and West of Reynolds Lane

Q31. Do exceptional circumstances exist to alter the Green Belt boundary in this location, having particular regard to paragraphs 140 – 143 of the Framework?

Before considering the response to this question in detail it is important to note that **CD3.93c** states that the impact of the site’s release on the adjacent Green Belt will be negligible. Harm resulting from the release of AL/RTW5 will be Low-Moderate.

Our response to Matter 4 principally deals with the more strategic issues that Paragraphs 140 and 141 of the NPPF (2021) grapple with.

Paragraph 142 of the NPPF (2021) specifically requires that local planning authorities have sustainability in mind when they are looking at Green Belt release. With Green Belt typically having been established around larger towns/built up areas there is a balancing exercise to be undertaken to see if sustainable development needs could be better served by ‘jumping over’ the Green Belt. In the context of Tunbridge Wells when one ‘jumps over’ the Green Belt they land in the AONB. The villages in the AONB are generally much lower order settlements and, as advocated by Paragraph 105 of the NPPF (2021), not locations where significant growth should be prioritised.

By contrast, AL/RTW5 clearly demonstrates sustainable credentials in being functionally linked into the existing main service centre of Royal Tunbridge Wells and well served by a range of public transport options. At the macro level Tunbridge Wells has demonstrated that there are not reasonable options that would allow them to not seek to identify available and suitably located sites in the Tunbridge Wells and Southborough Main Area.

Our response to the relevant considerations set out under Paragraph 143 of the NPPF (2021) is included below.

Requirement of the NPPF (Where Relevant)	Response
a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development; and	The release of AL/RTW5 is consistent with the Plan’s overall strategy that those locations that are or can be made most sustainable are prioritised for development.
e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period	Tunbridge Wells is seeking to meet its objectively assessed need rather than seeking to delay this or review this at a later date which would inevitably result in a more piecemeal approach to release.
f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.	To the west, east and north there are already significant urbanising influences that surround the site. The curved nature of the Reynolds Lane means that built forms associated with the sports and education complex to the south is readily visible from the site. The revision to the Green Belt boundary in this location allows for the establishment of a more recognizable

	<p>and enduring boundary in the longer term through the dense wooded area that sits to the south of the site. The proposed allocation specifically seeks to reinforce and enhance this creating a more durable Green Belt boundary in the longer term.</p> <p>The Council's evidence at CD3.93c does rightly acknowledge the presence of the existing tree belt along Reynolds Lane however notes '<i>Whilst the mature hedgerow along Speldhurst Road creates a moderate boundary feature, garden boundaries on Reynolds Lane create a weak boundary feature.</i>' We agree with this assessment of the site.</p>
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We would be grateful if the Programme Officer could confirm receipt of this response.

Yours sincerely,



Adam Kindred
Director
CBRE Ltd

cc. Ben Shaw – Senior Planning Manager, Dandara

Appendix A – Extent of Dandara Interest

