

# Examination of the Tunbridge Wells Borough Local Plan

Statement on behalf of Taylor Wimpey UK Ltd

Matter 7 – Site Selection Methodology

May 2022

**Turley**

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**Client**  
Taylor Wimpey UK Ltd

**Our reference**  
TAYS3041

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# 1. Introduction

- 1.1 This statement is submitted on behalf of Taylor Wimpey UK Ltd for purposes of the Examination of the Tunbridge Wells Borough Local Plan.
- 1.2 The statement responds to the Inspectors' Issues and Questions for Matter 7 – Residential Site Allocations.
- 1.3 The concerns outlined by our client at the Regulation 19 stage (letter to TMBC dated 25<sup>th</sup> May 2021), on issues pertaining to the plan's legal compliance and soundness, have not been overcome thus far. If anything, the documents published by the Council for submission purposes only serve to highlight the deficiencies evident in the production of the plan now submitted.
- 1.4 Accordingly, we have examined the Inspector's questions for Matter 7 and provide responses to those we wish to contribute to debate on. We have also respectfully requested the opportunity to participate in the forthcoming hearing sessions to assist the Inspector further on such matters.

## 2. Response to Issues and Questions for Matter 7 – Residential Site Allocations

### *Issue 7 – Cranbrook and Sissinghurst*

*Question 6. Do sites AL/CRS1 and AL/CRS2 (either individually, or cumulatively) represent major development in the AONB, and if so, are they justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?*

- 2.1 Table 10, page 114 of the Councils 'Development Strategy Topic Paper for Pre-Submission Local Plan' (TWBC, Oct 2021) confirms CRS1 comprises major development, and due to its proximity with CRS1, CRS2 is also considered major cumulatively.
- 2.2 As outlined in our Matter 5 Statement, there are inconsistencies in our view with the weighting afforded such considerations in the site selection process, both through the SHLAA and SA processes. This includes fundamental flaws and errors in the way TWBC have assessed SHELAA Site 25 as a reasonable alternative against others, particularly those proposed for allocation, through both the SA and SHELAA site selection processes. This has led to the unjustified omission of Site 25 in our view, a site that is of a scale categorised as 'not substantial' for AoNB assessment purposes at Table 7 of Appendix 2 of the same 'Development Strategy Topic Paper for Pre-Submission Local Plan' (TWBC, Oct 2021). Rather than informing 'an appropriate strategy' for Cranbrook, the site selection process appears instead to have been designed with a pre-determined outcome in mind.
- 2.3 We elaborate on such matters in our Matter 5 Statement. Therefore, in the interests of brevity, we are content to rely upon this rather than reassert here.
- 2.4 As we additionally outline in our Matter 2 and 3 Statements, we contend there are strong grounds to revisit the quantum of growth assessed through the SA process, and the reasonable alternatives to distribute this to sustainable settlements in the settlement hierarchy. In this respect, we note at Table 53 (Page 150) of the SA (2021), our client's site (SHELAA Ref: 25) is listed as a 'reasonable alternative site' at Cranbrook. We would respectfully suggest there are strong grounds to reassess such reasonable alternatives. This a logical, modest, and suitable location for homes, located a short walk from the heart of Cranbrook. It will make a modest contribution to the shortfall in supply we outline in our Matter 2 and 3 Statements, particularly in the first five years of the plan period.

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