

Examination of the Tunbridge Wells
Borough Local Plan

**Tunbridge Wells Borough Council
Hearing Statement**

**Matter 14: Sustainable Design and
Heritage and Conservation
(Policies STR2, STR4, STR7, EN1,
EN2, EN3, EN4, EN5 and EN7)
Issue 5: Ensuring Comprehensive
Development**

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Matter 14 – Sustainable Design and Heritage and Conservation (Policies STR2, STR4, STR7, EN1, EN2, EN3, EN4, EN5 and EN7)

Issue 5 – Ensuring Comprehensive Development

Inspector’s Question 1: [re. justification and effectiveness of STR4]

What is the justification for Policy STR4 and will it be effective in ensuring comprehensive development?

TWBC response to Question 1

Introduction

1. Policy STR 4 of the Submission Local Plan [[CD 3.128](#)] is regarded as important to ensure that a comprehensive approach to site development is undertaken for the good planning of the area and, in relation to allocated sites, to ensure that the relevant Policy provisions are achieved.
2. As summarised within the Council’s response below, the supporting text (Paragraphs 4.73 – 4.87) of Policy STR 4 includes a clear justification for the Policy, as well as setting out how the Policy will be effective in ensuring comprehensive development.

Consideration

3. As set out in paragraph 4.73 of the Policy’s supporting text, “*Taking a comprehensive approach to sites, especially for mixed-use developments and/or where there are multiple land ownerships, and showing a willingness to use Compulsory Purchase Order (CPO) powers if needed to achieve this, are regarded as strategically important*”.

4. In contrast, *“Bringing forward piecemeal developments on a land ownership basis may well not constitute the good planning of an area”* (paragraph 4.74). This paragraph goes on to set out that there will likely be a need for many sites to be brought forward in a comprehensive way and that *“This is to ensure effective integration between proposals for the respective land ownership parcels, as well as with the wider locality. Without a mechanism for ensuring collaboration and a comprehensive approach to development areas, elements that help contribute to place shaping and a good quality environment, such as green space corridors, open spaces, pedestrian/cycle linkages, community and other non-commercial facilities, are unlikely to be properly planned for, or provided”*.
5. The Policy also sets out that the most appropriate and effective mechanism for achieving comprehensive development, particularly where sites have several land use elements or are in multiple ownerships, will be secured via an appropriate means of masterplanning/form of overarching strategic framework.
6. As outlined within Paragraph 4.76, the most formal and inclusive approach is through a Supplementary Planning Document (SPD), which may take the form of a site-specific ‘Planning Brief’. It is noted that masterplans, in the form of SPDs, will be required for STR/SS1 and STR/SS3. In respect of STR/SS 1, the Council draws attention to its response to Question 23 of Matter 6, Issue 3. In accordance with Policy STR4, formalising this masterplanning approach for the whole allocation will ensure that the development comes forward in an integrated and comprehensive way, thereby being effective in preventing piecemeal development from occurring.
7. As set out in Paragraph 4.84 of the Policy’s supporting text, CPOs may also enable comprehensive development to be achieved where complex and multiple land ownerships are involved and which could prevent development which would otherwise only be undertaken in a piecemeal fashion, which would not secure important community infrastructure or other sound planning objectives.

Conclusion

8. Securing the effective delivery of development sites is at the heart of plan-making. As above, taking a comprehensive approach to sites, especially mixed-use developments and/or where there are multiple land ownerships, and showing a willingness to use CPO powers if needed to achieve this, are regarded as strategically important.

9. Consequently, the Council considers that Policy STR 4, which provides an overarching approach to these matters is justified and will be effective in ensuring that, where necessary, comprehensive developments are delivered.