

Planning Policy  
Planning Services  
Tunbridge Wells Borough Council  
Royal Tunbridge Wells  
Kent  
TN1 1RS

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Sent by email to: localplan@tunbridgewells.gov.uk



**RE: Consultation on Council's Response to Inspector's Initial Findings**

Gleeson welcomes the opportunity to provide feedback on the Council's Response to the Inspector's Initial Findings. These representations should be read in conjunction with earlier representations submitted on Gleeson's behalf by Town and Country Planning Solutions through previous consultations on the Local Plan.

While the Council's efforts to modify the plan are appreciated, we have concerns regarding the lack of sufficient housing land allocations and the proposed reliance on an early review as a consequence of the removal of Tudeley Village site allocation and the reduction of homes allocated to Paddock Wood.

We also reiterate our objections made through previous consultations and at the Local Plan hearing sessions that the release of Green Belt land around the edge of Tunbridge Wells has not been properly considered and as such the proposed spatial strategy continues to be fundamentally flawed.

Furthermore we continue to strongly object to the proposed designation of 'Land at Pembury Road, Tunbridge Wells' as a Local Green Space.

**The Development Strategy – Policy STR1**

The proposed modification to Policy STR1 to reduce the plan period from 15 years to 10 years is not in accordance with the National Planning Policy Framework (NPPF) requirement at paragraph 22 for strategic policies to look ahead over a minimum 15 year plan period. A 15-year plan period, aligned with national policy, is crucial for providing a stable framework for development and ensuring housing delivery keeps pace with demand.

The removal of Tudeley Village and the reduction in the number of homes at Paddock Wood, without allocating alternative sites to make up the shortfall, is therefore not a sound approach towards resolving the issues faced.

We have significant concerns that an early review may not be completed in sufficient time to provide an ongoing supply of housing land in the later years of the plan. We urge the Council to continue with a 15 year plan period, as required by national policy. The Council should therefore identify and allocate additional sites in the emerging Local Plan to meet the housing needs in full.

### **Ensuring a sufficient supply of new homes**

In addition to the above concerns there is no clear justification for using the [REDACTED] for calculating the 5-year housing land supply. As such the [REDACTED] should be followed to ensure the plan delivers the required new homes throughout the plan period in an approach that is consistent with national guidance.

### **Green Belt Study Stage 3 Addendum**

We maintain our position that the Council has failed to properly consider reasonable alternative sites in the Green Belt.

The Green Belt assessment methodology approach of not accounting for potential mitigation to Green Belt harm is unreasonable. New development on any site, whether in or out of the Green Belt will normally require mitigation, which is taken into account through the decision making process. The contribution of mitigation measures to ensure a new defensible boundary should therefore be taken into account when assessing the suitability of a site to be released from the Green Belt. The Green Belt assessment should be repeated on this basis and sustainable sites identified for allocation to contribute towards identifying a housing supply over a 15 year plan period.

We maintain that the proposed developable area in the western part of 'Land at Pembury Road, Tunbridge Wells' (SHELAA ref 99) makes only a low contribution to Green Belt purposes, as set out in the EDP report previously submitted by Gleeson at the Regulation 19 stage. The Council's SHELAA assessment of the site that has informed the Green Belt Assessment work is considered to be incorrect. There are not *'far reaching views at the highest levels of the site to beyond the hospital at Pembury.'* As referred to in the Council's assessment. The EDP report instead concludes that the limited properties of the Green Belt land that 'Land at Pembury Road' represents, together with the distinct relationship between the site and Tunbridge Wells; limited inter-visibility between the site and Pembury to the east and the comparatively effective defensible edge that the site would provide, would

combine to ensure that the removal of this land from the Green Belt would not cause unacceptable harm to the wider Green Belt function.

### **Local Green Space**

We refer back to representations made through the Regulation 19 Local Plan consultation and continue to object to draft Policy EN17 Local Green Space (LGS) as being contrary to paragraph 35 of the National Planning Policy Framework (NPPF) in not being positively proposed, justified, effective or consistent with national policy to promote sustainable development.

NPPF paragraph 101 is clear that *"the designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them"*, but this should be *"consistent with local plans of suitable developments and complement investment in sufficient homes, jobs and other essential services"*. As set out in our earlier representations the Council's own criteria for designating Local Green Space are not applicable to 'Land at Pembury Road, Tunbridge Wells' (LGS site 217) (SHELAA ref 99).

The designation of the site as LGS is unnecessary and unjustified and is strongly objected to. The site is already designated as Green Belt and the Council has still not provided any explanation for why the site needs additional protection that is not already afforded to it by virtue of being in the Green Belt. The site is privately owned with no public access. The only function it can possibly provide is as part of a view when standing on Pembury Road between Tunbridge Wells and Pembury. There would be no additional local benefit to be gained by designating the site as Local Green Space.

The Council refers to support via previous consultation responses, from a local community group, a resident and a Councillor,. Based on these comments the Council concludes in the post hearing action statement that *"This green space provides for an important green space gap that also forms a visually attractive landscape approach in between the settlements of Royal Tunbridge Wells and Pembury. It forms part of an attractive view for those arriving in Tunbridge wells along Pembury Road by car, by bicycle, or on foot. Notwithstanding the objection from the landowner, the Council considers that this site is unsuitable for development and should be designated as an LGS in order to ensure its protection and identification as a green space of particular importance to the local community."*

Gleesons position is that the comments do not provide sufficient evidence that the site is of particular local value. The site was put forward to be allocated as LGS by an 'in office suggestion' and the Council have only been able to retroactively point to

support for it in comments made by the Royal Tunbridge Wells Town Forum, a single resident and a Councillor.

The Council's reference to support from a Councillor is found in a response to the Draft Local Plan comment number DLP\_537 which only provides a general statement of support that *"Open space is needed to promote the discrete area of green fields between the settlements of Sherwood (Tunbridge Wells) and Pembury."* The purpose of Local Green Space is not to protect gaps between settlements, or to protect settlements from merging. Such protection is provided through the designation of the land as Green Belt.

The Royal Tunbridge Wells Town Forum comment number DLP\_1847 also only gives [REDACTED] Local Green Spaces and Policy EN17 overall. The comment [REDACTED] *support the inclusion of all eligible sites across the Borough and welcome the added protection that designation as a Local Green Space will bring for those designated following the Draft Local Green Space assessments and ongoing consultations."* No specific sites are mentioned, so the general support for 227 of the proposed Local Green Space sites is not considered specific enough in relation to site 217 to demonstrate there is strong local support for the site to be designated as LGS that would outweigh the strong landowner objections to the designation.

Only a single response specific to the site was made by a resident (comment number DLP\_357), who supported the site being designated as LGS, primarily because they do not want the land to be allocated for housing. They also incorrectly assume that once designated as LGS the site would be *"properly managed and preserved for people to enjoy"*. The site would still remain in private ownership with no public right of access.

The limited level of support is such that the Council has not provided compelling evidence that the site is of particular importance to the Local Community. The support of one resident and very general support for Local Green Spaces in principle is nowhere near sufficient. It is therefore still considered that there is absolutely no justification for designating 'Land at Pembury Road, Tunbridge Wells (LGS site 217) as Local Green Space.

### **Conclusion**

The proposed modifications to the Local Plan fall short of addressing long-term housing needs and do not adhere to national policy. In particular the plan period should continue to be for 15 years. As such it is essential for the Council to allocate additional sites in sustainable locations now to replace the dwellings lost through the identified modifications.

Gleeson continues to object to the Council's approach to assessing the contribution of 'Land at Pembury Road, Tunbridge Wells' (SHELAA ref 99), towards the function of the Green Belt, and maintains that the site represents a suitable and readily deliverable site that can make a valuable contribution towards meeting the borough's housing needs over the plan period.

A strong objection is also maintained against the proposed designation of the site as Local Green Space, which is considered wholly unjustified and with insufficient evidence that the site is of any particular importance to the local community.

Yours Sincerely,



Peter Rawlinson  
Planning Manager