

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

30<sup>th</sup> April 2025


Sent by email to: [localplan@tunbridgewells.gov.uk](mailto:localplan@tunbridgewells.gov.uk)

Dear Sir/Madam

**RE: Tunbridge Wells Local Plan Main Modifications Consultation**

These representations should be read in conjunction with earlier representations submitted on by Gleeson throughout previous consultations on the Local Plan.

While the Council's efforts to modify the plan are appreciated, concerns remain regarding the lack of sufficient housing land allocations, reducing the land supply period to 10 years rather than 15, and the proposed reliance on an early review. It is considered that this is not an adequate solution to 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  fundamentally flawed.

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

**Development Strategy Policy STR 1**

**Main Modification Ref: MM3, MM13, MM15 & MM16**

Main modifications MM3, MM13, MM15, and MM16 are considered unsound because they are contrary to the National Planning Policy Framework (NPPF) requirement at paragraph 22 for plans to look at least 15 years ahead from adoption. The main modifications now propose a housing land supply for only the first 10 years, with the remaining needs to be addressed through an early review. Instead, to

be sound and effective, the Local Plan should demonstrate a housing supply for the entire 15-year period.

NPPF paragraph 72, requires strategic policy-making authorities to understand their available land and identify specific, deliverable sites for the first five years post-adoption. Paragraph 72(b) further requires identifying specific, developable sites or broad growth locations for years 6-10, and where possible, for years 11-15. Given the extensive examination and thorough site identification process, the Council should have sufficient knowledge of available land to identify sites for the plan's later years now. Therefore, the current proposal, which only demonstrates a 10-year supply, renders the plan ineffective and inconsistent with national policy.

The removal of Tudeley Village and the reduced housing numbers at Paddock Wood, without allocating alternative sites to make up the shortfall, is not a sound approach and could hinder the borough's ability to meet its housing needs in later years.

We are also significantly concerned that an early review may not be completed in time to rectify this deficiency in good time and to ensure a continuous housing land supply for the later years of the plan. This uncertainty could jeopardize the borough's ability to meet its housing targets and maintain a steady land supply.

Therefore, the Council should adhere to the national policy requirement for a 15-year plan period, providing a more stable and predictable development framework. Accordingly, the Council should identify and allocate additional sites in the Local Plan now to fully meet housing needs across the full plan period. This proactive approach will ensure the borough can meet its targets and provide sufficient development land.



## **Main Modifications Ref: MM196 and MM197**

The proposed modifications at MM196 and MM197 in relation to Policy EN 15: Local Green Space (LGS) are considered to be insufficient and furthermore the underpinning methodology leading to the allocation of Local Green Spaces is unsound. Specifically regarding the designation of sites where there has not been enough evidence that they have been brought forward by local communities and are back by local support.

We refer back to representations made through the Regulation 19 Local Plan consultation and continue to object to draft Policy EN 15 Local Green Space as being


contrary to the NPPF in not being positively proposed, justified, effective, or consistent with national policy to promote sustainable development.

The designation of the site as LGS is unnecessary and unjustified. 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 purportedly provides is as part of a view when travelling along the A264 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.

NPPF paragraph 106 starts by clearly setting out that “The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.” but this should be “consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”

NPPF Paragraph 107 goes on to set out three criteria land must adhere to be designated as Local Green Space.

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

 representations, the NPPF and 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 Council has referred to support via previous consultation responses from a local community group, one 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.”

Gleeson's position continues to be that there is not 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 has 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. Or should be dealt with by a local gap policy.

The Royal Tunbridge Wells Town Forum comment number DLP\_1847 also only gives very general support of Local Green Spaces and Policy EN 15 overall. The comment states, “We strongly 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. 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 [redacted]” and 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. The Council is urged to reconsider the designation of this site as Local Green Space and to ensure that any designations are fully justified, effective, and consistent with national policy.

In addition to the above overriding objections the following amendments to criterion 3 of Policy EN 15 is suggested to allow for the mitigation of the impact of development as an alternative to offsetting the loss or detriment, to account for a scenarios where mitigation on site is suitable alternative to like for like compensation. Such a modification would assist in unnecessarily restricting the provision of sustainable development. (proposed additional text in **blue bold**)

The proposed development does not materially reduce the community use, detract from the function, or **significantly** affect the appreciation of the designated area of Local Green Space **and, furthermore, where possible in such cases, where it can be demonstrated that on-site mitigation measures can adequately address any loss of, or detriment to, the area of Local Green Space, this will be considered an acceptable alternative to offsetting. Where on-site mitigation is not sufficient,** ~~There~~ will be acceptable provision to **mitigate or** offset any loss of, or detriment to, the area of Local Green Space on, or close to, the site.

## **Conclusion**

In conclusion, for the reasons detailed above and in our previous representations, Gleeson Land maintains that the proposed Main Modifications fail to address fundamental soundness issues within the Local Plan. Specifically, the reduced housing land supply period, the reliance on an early review, and the unjustified designation of 'Land at Pembury Road, Tunbridge Wells' as Local Green Space remain significant concerns. We urge the Council to reconsider these modifications and to align the Plan with national policy by ensuring a full 15-year housing land supply and by applying a robust and evidence-based approach to Local Green Space designations.

Yours faithfully,



Peter Rawlinson  
Planning Manager