



Planning Department  
Tunbridge Wells Borough Council  
Mount Pleasant Road  
Royal Tunbridge Wells  
Kent  
TN1 1RS

Our ref: JB/33130

23 February 2024

Dear Sir/Madam,

## **COMMENTS ON THE COUNCIL'S RESPONSE TO THE INSPECTOR'S INITIAL FINDINGS LETTER ON THE EXAMINATION OF THE BOROUGH LOCAL PLAN**

I write on behalf of my client, Vistry Group (Vistry), to provide comments on Tunbridge Wells Borough Council's response to the Inspector's Initial Findings on the Local Plan Examination. The Council is seeking comments on their response until Monday 26 February 2024.

### **Background**

Vistry controls land at Pembury which is proposed to be allocated for approximately 80 residential units under site reference AL/PE3: Land North of the A21, South and West of Hastings Road. We have made previous representations in relation to the same site on behalf of Countryside Partnerships, prior to their combination with Vistry.

As set out in our Reg. 19 response, Vistry have developed a draft illustrative framework plan for the site, which demonstrates that a development of approximately 80 units can be achieved whilst taking account of the constraints identified within the policy. The site was discussed in detail in the relevant Examination Hearing held in summer 2022.

Vistry continues to **support** the proposed allocation AL/PE3 as per our previous representations.

### **Changes to the Local Plan Strategy**

Tunbridge Wells Borough Council has proposed the following changes to the Local Plan strategy in response to the Inspector's Initial Findings letter published in November 2022. Those changes can be summarised as follows:

- Proposed removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village from the Local Plan;
- Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel, including a reduction in the amount of residential housing growth by



approximately 1,000 dwellings, with all housing being on Flood Zone 1 and employment land on Flood Zone 2, along with a reduction of employment provision, and reconfigured sport and recreation provision and secondary school education provision (as set out at Appendix D of the Development Strategy Topic Paper Addendum);

- At Hawkhurst it is proposed to revise site allocation policy number AL/HA 5: Land to the north of Birchfield Grove, to include housing, and land safeguarded for primary school expansion (in accordance with a planning committee resolution on application reference 22/02664/HYBRID);
- Also at Hawkhurst, the Council proposes the removal of site allocation policy number AL/HA 8: Limes Grove (March's Field) from the Local Plan. This site was proposed for employment use in the Submission Local Plan; and
- Progression of a 10 year housing land supply position including the requirement for an immediate review of the plan.

We agree that it is important that the Council gets a Local Plan in place as soon as possible to ensure that Tunbridge Wells Borough Council is able to meet its housing needs over the next ten years. Vistry therefore **supports** the proposed changes to the Local Plan strategy, and considers the resulting proposed Local Plan to be sound.

### **Additional land at Pembury**

Whilst our client fully supports the proposed approach, if the Inspector disagrees and considers that additional sites need to be allocated in the current Local Plan in order for it to be sound, the Council will need to further reconsider alternative sites.

In that scenario, additional land is available at Pembury within my client's control which should be considered for allocation. That land has been promoted through the Call for Sites and earlier stages of the preparation of the Local Plan. This land is as follows:

*SHELAA Site 190: Land south-east of Sandhurst Avenue, Pembury*

This 3.5ha site comprises two agricultural fields between Sandhurst Avenue and the A21 dual carriageway. The fields are separated by tree and hedge planting. A public footpath (WT234) runs through the centre of the site, following the field boundaries.

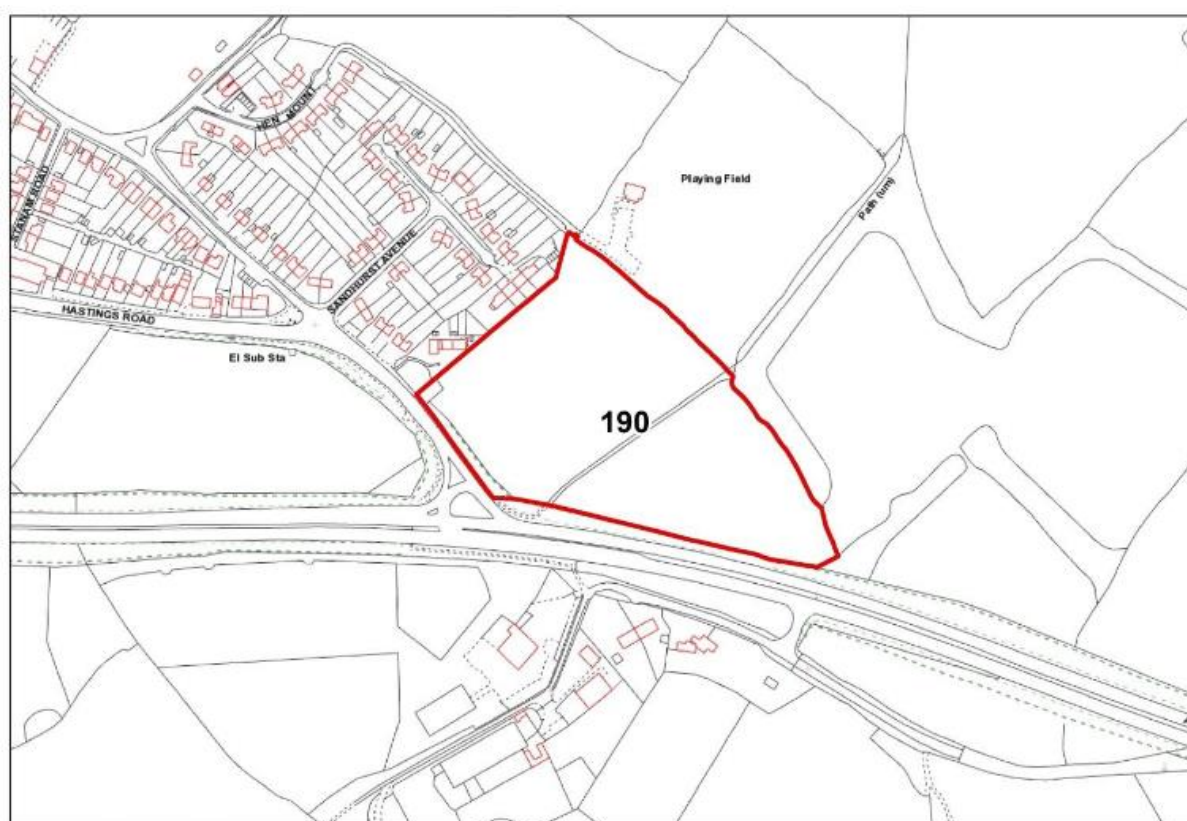
To the north-west is Sandhurst Avenue, a residential development which also includes some housing fronting Hastings Road. There is hedgerow planting along this boundary. The south-western boundary is formed by fencing and hedgerow fronting Hastings Road as it approaches its junction with the A21, immediately west of the site. There is a gated field access, directly opposite a similar access to that within the draft allocated site AL/PE3 on the other side of Hastings Road.

The southern boundary is formed by the A21 dual carriageway, from which the site is separated by dense tree, shrub and hedgerow planting. To the east are further agricultural

fields. The northernmost part of the north-eastern boundary is formed by the Woodside Recreation Ground, which is laid out as sports pitches together with an area of hardstanding for parking, and a pavilion. This boundary is also formed of tree and shrub planting.

If developed in isolation, access might be possible directly from Hastings Road at the existing field access point, subject to considerations of its proximity to the A21 junction. Alternatively, there may be potential to access the site from the Woodside Recreation Ground to the north, subject to upgrading of the existing road infrastructure.

The site area is shown below.



Whilst the updated SHELAA states that the site is unsuitable for allocation, this appears to be due mainly to the conclusions that the southern half of the site would result in a high level of harm to the Green Belt. This draws upon further assessment work undertaken by the Council as an Addendum to its Green Belt Stage 3 Assessment.

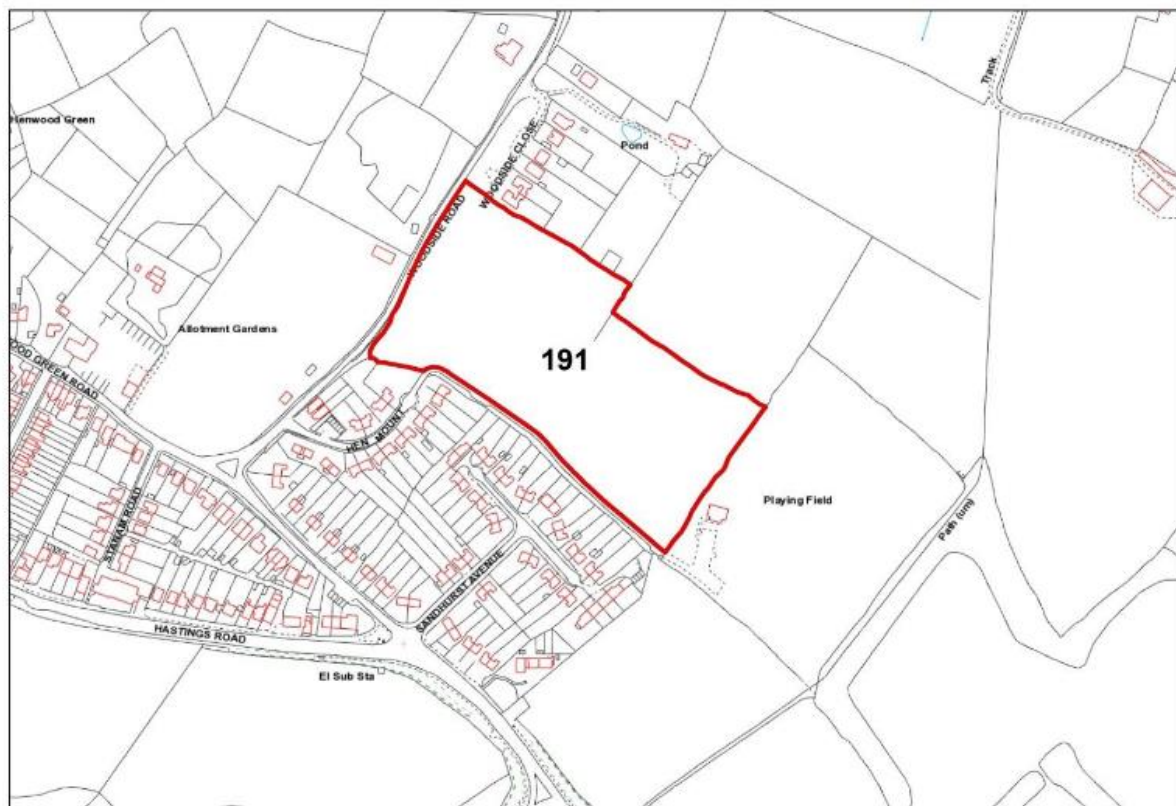
However, according to the Council's assessment, the northern part of the site (which relates better to existing development) would result only in a moderate level of Green Belt harm, with the parcel making a relatively weak contribution to checking the sprawl of large built-up areas and safeguarding the countryside from encroachment. The assessment also noted the existence of potential mitigation measures such as enhancing existing hedgerows and/or introducing more robust locally characteristic woodland belts along the

parcel boundaries, especially to the south east, to reduce the visual impact of development on adjacent Green Belt land.

We consider that the site would form a logical area for future growth of Pembury.

*SHELAA Site 191: Land north of Henwoods Mount and east of Woodside Road, Pembury*

This 2.9ha site comprises an agricultural field on the eastern edge of the village. Access is possible either via a connection to Site 190 in the south west, or via a dedicated access off Woodside Road. The site is shown below.



The site is bounded to the south-east by the Woodside Recreation Ground, which was described further above. To the north-east are further agricultural fields together with a small close of residential properties at Woodside Close, just off Woodside Road.

Woodside Road, a tree and hedge-lined country lane leading to the hamlet of Romford and eventually on towards Matfield, forms the north-western boundary. To the north of Woodside Road is a valley with woodland and fields, beyond which is the northern part of Pembury village. There is also a large area of allotments immediately west of the site between Woodside Road and Henwood Green Road.



The south-western boundary is formed by an access track leading to the Woodside Recreation Ground from the residential street of Henwoods Mount. The residential areas of Sandhurst Avenue and Henwoods Mount are located beyond this track.

It is noted that the SHELAA previously assessed that the release of this site would have a harm rating of high. However, following the new updated Green Belt assessment, the likely impact has been downgraded to moderate. The Green Belt assessment noted that garden boundaries provide a weak degree of boundary separation from the built area to the south, and that residential dwellings on Woodside Close mean there is already an urbanising influence within the parcel.

As with parcel 190, potential mitigation measures could include enhancing existing hedgerows and/or introducing more robust locally characteristic woodland belts along the boundaries of the parcel.

As a result, we consider that the site would also form a logical area for future growth of Pembury.

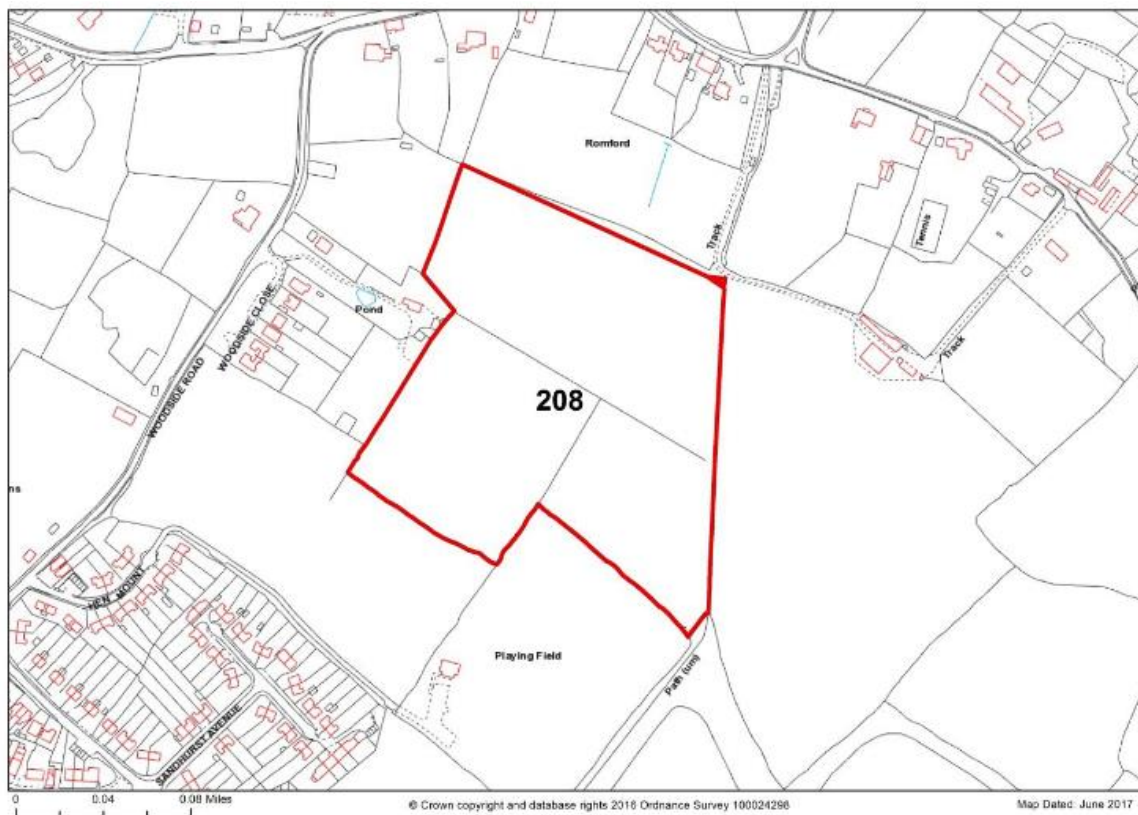
It should be noted that whilst development of all or part of these sites could result in moderate Green Belt harm, this level of harm is no greater than, or indeed lower than many other sites considered in the same assessment, making them appropriate candidates for development if the Inspector considers that further releases are necessary.

#### *SHELAA Site 208: Land southeast of Woodside Close*

This 5.68ha site comprises an agricultural field to the north of the Woodside playing fields and has a potential yield of 170 units. The site was considered in the original SHELAA but the assessment has not been updated in the 2023 Updated Assessment of Reasonable Alternative Green Belt Sites.

The site is shown overleaf.





The site can be accessed via site 191, therefore site 208 should be considered for development alongside site 191.

The site forms part of a wider parcel, the release of which was assessed as having a High impact on the Green Belt. Potential mitigation measures identified again include enhancing existing hedgerows and/or introducing more robust locally characteristic woodland belts along the boundaries of the parcel.

Whilst the level of harm associated with releasing this parcel has been assessed as being higher, it may still be considered to be an associated release if developed (or partly developed) in conjunction with the land to the south, as part of a comprehensive scheme.

### Summary

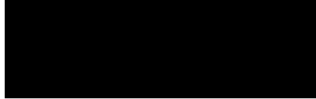
Vistry continues to fully **support** the proposed allocation AL/PE3 as per our previous representations.

Vistry also **supports** the proposed changes to the Local Plan strategy.

If, however, the Inspector considers that additional sites need to be identified, the additional land at Pembury discussed in this letter would make excellent candidates for further development.



Yours sincerely,



Jonathan Buckwell  
Director

