JudithAshton Associates



Wednesday 14th February 2024 651/A3/JJA

Planning Policy
Tunbridge Wells Borough Council
Town Hall
Civic Way
Royal Tunbridge Wells
Kent
TN1 1RS

By Email Only

Dear Sirs

Re: Tunbridge Wells Borough Local Plan - Proposed response by TWBC to the Inspector's Initial Findings

Representations on behalf of Persimmon Homes South East Land at Bassetts Farm, Goudhurst Road, Horsmonden, Kent

I write with reference to the above. As you will be aware, I act for Persimmon Homes South East who have various interests in Tunbridge Wells, including the Land at Bassetts Farm, Goudhurst Road, Horsmonden which is identified as a proposed allocation in the Submission Local Plan (Policy AL/HO 3 refers). Whilst we note the Inspector in his Initial Finding made no comment on the proposed allocation of the land at Bassetts Farm, we do note that the Councils proposed response to the Inspector's Initial Finding in proposed Modification SLP Mod 4 looks to replace table 4 of the Submission Local Plan to reflect the revised development strategy, and that said updated table looks to revies the scale of housing proposed in Horsmonden thus:

Parish / settlement	Lower	Upper
Horsmonden	240 230	320 290

We understand that the above changes reflect the fact that the scale of development that has been consented/ proposed on the three sites allocated in Horsmonden during the plan period pursuant to Policies AL/HO 1, AL/HO 2, and AL/HO 3 now differs from that originally envisaged, asset out in eth table below:

Site	Policy reference	Number of units envisaged	Number consented/ proposed	App reference
Land adjacent to Furnace Lane and Gibbet Lane	AL/HO1	Approx 45 – 55 dwellings	49 dwellings consented and built	18/01976/FULL
Land South of Brenchley Road	AL/HO2	Approx 80-100 dwellings	68 dwellings consented	22/00296/OUT
Land at Bassetts Farm, Goudhurst Road	AL/HO3	Approx 115-165 dwellings		19/03657/REM 24/00078/HYBRID
Total		240-320	257 i.e. within the range of 230 – 290	

Whilst we have no objection to proposed Modification SLP Mod 4 as it is in effect a factual update that reflects the position as it now stands, we note that representations have been made in behalf of Horsmonden Parish Council that seek to use this modification as a means to reopen the debate about the merits of the proposed allocation of the land at Bassetts Farm. Whilst this may be naivety

on behalf of the authors, we note that the Council's web site is clear in that although this consultation is open to all, the scope of this public consultation is focussed on the Council's response to the Inspector's Initial Findings Letter, including the revised Development Strategy for the Submission Local Plan (SLP). To this end we also note that nowhere in his Initial Findings did the Inspector pass comment upon the merits of the proposed strategy for Horsmonden or the allocation of any of the sites in Horsmonden, unlike the allocation of the land at Tudeley and Paddock Wood, and the strategy for Royal Tunbridge Wells, Southborough, Cranbrook and Sissinghurst, Hawkhurst, Benenden, Pembury, and Sandhurst. This consultation on the council's response to the Inspector's Initial Finding does not in our opinion reopen the debate as to the merits of the strategy for Horsmonden or the associated allocation of sites AL/01, AL/02 and AL/03. If when it comes to main modifications, any main modifications are made to policy AL/03 we will respond accordingly at that time. But as matters stand, we do not see this consultation as enabling us, or any other party, to comment on either the scale or form of development proposed at Bassetts Farm. If however, this matter is reopened at any reconvened Local Plan Examination we reserve the right to respond as necessary to the assertions being made on the Parish Councils behalf.

To this end we would welcome the opportunity of discussing the Councils position on this matter as soon as they are able.

Yours sincerely

JUDITH ASHTON
Judith Ashton Associates

Matt Besant Persimmon Homes South East