

Bassetts Farm Forum Representation to the Public Consultation on Tunbridge Wells Borough Council's Response to the Inspector's Initial Findings Letter on the Examination of the New Local Plan

This presentation to the above consultation is being made on behalf of Bassetts Farm Forum (The Forum), which is a forum for the residents of Horsmonden to exchange views on the proposed Submission Local Plan Allocation Policy AL/HO3 for development on Land East of Horsmonden. The Forum currently has 154 email subscribers.

The consultation states:

“The proposed Revised Development Strategy and full response to the Inspector's Initial Findings Letter is set out in the [Development Strategy Topic Paper Addendum](#) [PS_054]”

This Local Plan Development Strategy Topic Paper – Addendum. January 2024, is largely concerned with developments for Tudely and Paddock Wood, but at paragraph 13.1, the report refers to housing allocations for Horsmonden.

The Forum fully supports the response submitted by Horsmonden Parish Council for this consultation. [See HPC Website link](#)

We agree that SLP Table 4 that sets out the proposed allocations is **not correct and does not reflect the current situation** for the three proposed allocations for Horsmonden.

AL/HO1 – Land adjacent to Gibbet Lane:

Development of this site has been completed with **49 houses**, not 45 to 55.

AL/HO2 – Land South of Brenchley Road:

As stated in the Development Strategy Topic Paper – Addendum, this development has been granted outline planning permission for **68 houses**, not 70.

AL/HO3 – Land East of Horsmonden:

As explained by the Horsmonden Parish Council Response, the AL/HO3 allocation housing target needs to be changed to reflect the following:

AL/HO3 development within the next 10 years:

- | | |
|--|------------------|
| 1. Consented Brownfield Site on Goudhurst Road (15/505340/OUT & 19/03657/REM): | 20 houses |
| 2. New allocated development: | 120 reduced by |
| Old Station Garage part of SHELAA site 108: | (10) |
| East Site Landscape visual impact revision: | (16) |
| Bassetts Villas heritage asset setting allowance: | (5) |
| New Development on SHELAA sites 297 and 82 | 89 houses |

AL/HO3 development likely to be beyond the next 10 years (subject to Hop Pickers' Line protections):

- | | |
|--|------------------|
| 3. Old Station Garage part of SHELAA site 108: | 10 houses |
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This gives a revised AL/HO3 allocation of 119 or **a range of 102 to 136 (as per the Parish Council details), not 115 to 165**

The East Site visual impact revision and the Bassetts Villa heritage asset setting allowance referred to above are **justified** in the Horsmonden Parish Council submission and in the Evidence Report that accompanies the Parish Council submission (as required by NPPF 2023 paragraph 35).

The overall allocation for Horsmonden is therefore 219 to 253, not 230 to 290 as suggested in the Local Plan Development Strategy Topic Paper – Addendum. January 2024. The revised allocation range for Horsmonden could be **effective** as per NPPF 2023 paragraph 35, ie “deliverable over the plan period”, whereas an uncorrected allocation range would be misleading and ineffective.

Furthermore, Document PS_062 Updated Local Plan Housing Trajectory (December 2023), referenced in this consultation, shows developments at AL/HO2 and AL/HO3 both taking place between 2026 and 2028 (with the consented 20 houses at AL/HO3 being completed earlier than this). This is a change for AL/HO3 which was projected to take place between 2030 and 2032 in the previous version of the Local Plan Housing Trajectory (February 2021) used in discussions with the SLP Inspector in 2022.

This change in the planned timing of the delivery of the allocations for Horsmonden means that the Infrastructure Development Plan (IDP) (CD_3.142_Infrastructure-Delivery-Plan-October-2021) referenced as part the SLP is **out-of-date**.

There is no capacity for more patients at the Horsmonden GP practice today and the NHS has not even begun to work out how it will provide health services for the expansions. The Primary School is full and there is no clarity of how the increase in new pupils will be handled. Traffic volumes and traffic speeds are critical safety issues which can only be exacerbated by the allocations which will increase the population of the village by over 40%. Sewers near to the AL/HO3 site overflow today even before any development. And the capacity of water and electricity supplies to cope with the large relative expansion has not been confirmed. **The delivery of infrastructure must be tied to any allocated development such that NO new housing can be occupied unless the necessary infrastructure changes are completed first.**

A clear and committed set of infrastructure improvements is an essential part of a realistic, deliverable, and sustainable Submission Local Plan, as required by the NPPF including NPPF 2023 paragraph 35 which requires the TWBC SLP to be: “*Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*”

On behalf of Bassetts Farm Forum. 29th March 2024
Andrew Winser

