Supporting Information

To accompany representations in relation to Tunbridge Wells Borough Council’s (TWBC) Consultation Draft Local Plan (Regulation 18).

Tudeley Brook Farm, Whetsted Road, Paddock Wood, TN12 6QD
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APPENDICES

1 Site Location Plans
1 Introduction

1.1 This Statement has been prepared by Kember Loudon Williams, on behalf of Mr and Mrs Whetstone, to promote the allocation of land at Tudeley Brook Farm, Whetsted Road, Paddock Wood as part of the strategic allocation for Paddock Wood. These submissions have been prepared in response to Tunbridge Wells Borough Council’s Consultation Draft Local Plan (Regulation 18) and provide a technical assessment about the site demonstrating that the land is suitable, available and deliverable for development. The report addresses the site in the context of national policy explained through the National Planning Policy Framework (NPPF) and local policy in the form of the emerging Local Plan and in turn drawing positive conclusions.

1.2 This is the first time that the Council have been made aware of this site as it was not promoted in the earlier two Call for Sites exercises. However, now that the comprehensive expansion of the settlement of Paddock Wood is proposed (under Policy AL/PW1 and AL/CA3) we believe that there is a strong and credible planning case to support its inclusion within this planned growth. As a result, we are seeking to secure its allocation as an integral part of the planned growth for Paddock Wood framed/contained, as it is, by the A228 Whetsted Road.

1.3 In order to demonstrate the deliverability of this site, this report takes account of the key technical considerations including flood-risk, accessibility, ecology, landscape and visual impact and impact on the Green Belt.
2 Planning Policy Context

National Planning Policy

2.1 National planning policy in the form of the National Planning Policy Framework (NPPF) explains that the purpose of the planning system is to contribute to the achievement of sustainable development. A central aim of the NPPF is to achieve a significant boost in housing delivery to meet the needs of present and future generations. The social and economic benefits of providing for the full development needs of the area have however to be pursued in a balanced way to contribute to the achievement of sustainable development.

2.2 The NPPF states that strategic policies should be informed by a local housing need assessment. The objectively assessed housing need for the borough over the plan period to 2036 is confirmed as 13,560 dwellings (678 per year). With regards to identifying land for new homes, Paragraph 72 of the NPPF explains that:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities”.

Local Planning Policy

2.3 The emerging Local Plan indicates how the full development needs of the borough can be most appropriately met and proposes a development strategy based on dispersed growth across the borough along with a new ‘stand-alone’ garden settlement at Tudeley Village and the transformational expansion of Paddock Wood.

2.4 The two strategic allocations at Paddock Wood and Tudeley are to be delivered on a comprehensive masterplan basis. These sites are in relatively close proximity to the borough boundaries adjoining Tonbridge and Malling Borough Council and Maidstone Borough Council. The image at Figure 1 shows the location of these two strategic allocations in relation to the wider area.
The preferred development strategy for the growth of the Borough is set out in full in Policy STR 1. With regards to the expansion of Paddock Wood, Policy STR 1 states that this should be delivered through:

“…garden settlement principles to deliver housing and employment growth, new and expanded educational facilities, and provide strategic flood risk solutions to reduce flood risk and provide betterment to particular existing area. Regeneration of the town centre to provide a vibrant and viable new centre for the communities it will serve, as well as the delivery of a range of other community facilities and infrastructure, including new health facilities, a sports hub, new primary schools, expansion of the existing secondary school, and potentially the ‘offline’ A228 strategic link (i.e. the Colts Hill bypass)”.

The influences that have shaped the preferred Development Strategy are set out in the Distribution of Development Topic Paper. This acknowledges that the major urban extension of Paddock Wood would involve the loss of Green Belt land but following detailed assessments (including testing the Local Plan objectives against a Sustainability Appraisal) it was found unreasonable for large growth to occur in Areas of Outstanding Natural Beauty (AONB).
2.7 Alternative locations for growth have been considered as part of the Sustainability Appraisal, including the potential urban extension of other settlements including Tunbridge Wells, Southborough, Hawkhurst and Cranbrook but ultimately the Sustainability Appraisal concludes on Page 3 of the non-technical summary that:

“Paddock Wood was the only reasonable location for an extension and that a scale set away from the constrains in the south (ancient woodland and AONB), but with land take in the Green Belt to the west of Paddock Wood, would provide a suitable scale of extension with benefit for the economic, environmental and social elements of sustainability”.

2.8 The proposed strategy for the development of Paddock Wood is set out in Policy STR/PW 1. This explains that the scale of the proposed development for the urban expansion is set to include 4,000 new homes, considerable employment and associated educational, leisure and health facilities. This is to be developed using a comprehensive master-planning approach to include the proper provision of the necessary infrastructure, including highway works, active travel provision and flood mitigation measures. The inclusion of the subject site at Tudeley Brook Farm is an important and helpful addition in meeting the development need.

2.9 The land to be allocated for this urban extension (Allocations AL/CA 3 and AL/PW1) includes land parcels to the north, east and west of the centre of Paddock Wood. It also includes land located west of Paddock Wood that lies in the eastern part of Capel parish.

2.10 The wider site allocation has been broken down into 12 smaller parcels of land. The plan provided at Figure 2 below shows where the subject site sits in relation to the 12 parcels of land comprising of the strategic allocation for 4000 new dwellings.

2.11 The subject site borders PW 1_2 (North West Parcel) to the west and PW 1_3 (North Central Parcel) to the east. Both parcels of land have been identified within the Plan as being able to accommodate a mix of uses including housing, small scale commercial development, flood compensation/open space and scope for neighbourhood centre/mixed uses/primary school/sports pitches.
Figure 2: Strategic Allocations Context Plan
Tudeley Brook Farm

2.12 Tudeley Brook Farm immediately abuts the proposed strategic site allocation for the expansion of Paddock Wood. If the Council accepts the strategic growth at Paddock Wood at this scale, it is considered entirely logical to include the subject site as part of this extension.

2.13 The site is physically, functionally and visually interlinked with the proposed allocation. It is well contained and would integrate seamlessly with the proposed allocation. Whetsted Road (A228) acts as a strong defensible boundary and there would be no impact on the landscape when considered in the context of the strategic allocation. Overall, the site represents a logical extension to this allocation.
3 Site and Surroundings

3.1 Tudeley Brook Farm is a private home with several outbuildings and extensive grounds. The site extends to 2 hectares and a redline plan showing the extent of ownership is attached at Appendix 1. The site is located within the Parish of Capel and lies to the north of Paddock Wood directly south of Whetsted Road (A228).

3.2 At present, the site lies beyond the development boundary for Paddock Wood in an area defined as open countryside. It is on the edge of, but within, the Green Belt.

3.3 The site benefits from one of the only already established access arrangements direct from the A228 (Whetsted Road) onto land parcels PW1-1 and PW1-2 and has an extensive road frontage of approximately 170 meters. The road acts as a strong defensible boundary to the north of the site, a significant benefit when considering the benefit potential of the site.

Site Description

3.4 The house and outbuildings are located on the northern part of the plot, running parallel with the road. The built floorspace amounts to a total of 550 sqm comprising of the main house (270 sqm), the garage (130 sqm), the games room (100sqm), and the stables (50sqm).

3.5 The southern part of the plot comprises of a field which is more open in character. It is flat and a mature tree belt runs along the south and western boundary of this field. The land is used for recreational purposes and a photograph of this field and the tree belt is provided below for reference.

Figure 3: Photograph of Field to the South of the Site
3.6 It should be noted that the whole plot is being promoted for development. The existing farmhouse is not listed and has been extended considerably over the years. The associated outbuildings are relatively new structures, with the garage and workshop obtaining consent in October 2002 (LPA Ref: 02/01858). There are no special characteristics or circumstances to warrant the retention of these buildings.

**Site Context**

3.7 Paddock Wood benefits from excellent transport links and higher order facilities, such as a secondary school and sports centre. There is also a large employment area to the north of the railway line.

3.8 The Development Strategy (STR1) has already recognised Paddock Wood as being a sustainable location for new housing and the comprehensive expansion of the settlement will provide further infrastructure, employment, community and educational uses in the area.

3.9 Tudeley Brook Farm is well served by public footpaths. Public Right of Way (PRoW) WT175 runs the eastern boundary of the site and links onto PRoW WT174 which provides access to the centre of Paddock Wood and the train station. These footpath links are shown on the plan provided below in Figure 4.

3.10 Estimated walk time to the train station (which provides services to London and other towns and transport hubs such as Tonbridge, Ashford International and Dover Priory) is approximately 18 minutes.
Figure 4: Plan Showing the Location of Footpaths in Relation to the Subject Site.
4 Site Appraisal

4.1 In order to demonstrate the deliverability of this site, this Section provides a summary of the key technical considerations, including flood risk, ecology, landscape and visual impact and impact on the Green Belt.

Green Belt

4.2 The five objectives of the Green Belt are set out in Paragraph 134 of the NPPF:

   a) to check the unrestricted sprawl of large built-up areas;
   b) to prevent neighbouring towns merging into one another;
   c) to assist in safeguarding the countryside from encroachment;
   d) to preserve the setting and special character of historic town; and
   e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.3 The subject site is located in the Green Belt. The land surrounding the site is also located in the Green Belt. The current version of the Plan is seeking to remove this land from the Green Belt in line with the proposed strategic site allocation (under Policy AL/PW1 and AL/CA3). The Plan explains that there are exceptional circumstances to alter the Green Belt boundary in this location in order to bring forward a wide range of land uses to deliver strategic development.

4.4 The release of Green Belt land to the west of Paddock Wood is supported. However, on the basis that the subject site should be part of this strategic allocation, Tudeley Brook Farm should also be released from the Green Belt. The release of Tudeley Brook Farm in the context of the planned strategic allocation would not undermine any of the Green Belt objectives set out above.

Flood Risk

4.5 Planning policy at both the national and local level states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, defined as being Flood Zone 3. – this is acknowledged. Where development is necessary, it must be made safe without increasing flood risk elsewhere.

4.6 A Strategic Flood Risk Assessment has been produced to inform the Draft Local Plan and the distribution of development. The SFRA has been prepared in two parts – a Level 1 SFRA for
the whole borough and a Level 2 SFRA focusing on the land around Paddock Wood and East of the Parish of Capel.

4.7 The land around Paddock Wood and East of the Parish of Capel is prone to flooding - falling within areas of Flood Zone 2 (areas with a medium probability of river or sea flooding) or Flood Zone 3 (areas of high probability of river or sea flooding). A map showing the flood zone of this area, taken from the Council’s SFRA, is provided below for reference.

*Figure 5: Flood Zone Map*
4.8 The flood zone map demonstrates that the subject site is identified as being located in Flood Zone 2. The testing completed as part of the Level 2 SFRA provides a strategic understanding of the potential effect of development and the potential for mitigation by implementing flood risk management measures.

4.9 The strategic assessment finds that the principle of development around Paddock Wood can be supported. It identifies opportunities for flood risk management and it also finds that some of the measures could have a large positive effect on flooding in Paddock Wood, with the potential to provide ‘betterment’ for the existing settlement. The provision of flood storage/attenuation/mitigation areas to substantially reduce the flood risk to particular existing residential areas in Paddock Wood is one of the key justifications for the release of Green Belt land.

4.10 As a result of the above, the delivery of strategic flood risk measures is a key component of the master planning approach for the comprehensive development of site allocation Policy AL/PW1 and AL/CA3 and all development is expected to contribute to the provision of flood storage/attenuation/mitigation areas and flood defence works to reduce the flood risk to particular existing residential areas at Paddock Wood.

4.11 It is important that the subject site is not excluded from this exercise, especially given that it is in a lower flood zone than some of the other sites in the immediate vicinity and within the proposed allocation. Overall, the site, like those surrounding it, provides an opportunity for the delivery of strategic infrastructure or betterment. It could contribute proportionally with other allocated sites for these important infrastructure improvements.

Ecology

4.12 The site is well maintained and regularly mowed. As a result, it is considered that are no significant ecological constraints that would preclude the development of this site.

4.13 It is acknowledged that a more detailed ecological assessment of the site is required. This will be conducted during the more appropriate season.

Highways

4.14 As explained in Section 3 of this report, Paddock Wood benefits from good transport links and higher order facilities. As a result, it has been identified in the Development Strategy (Policy STR 1) as a settlement that can accommodate significant growth.

4.15 Policy AL/PW 1 recognises that the allocation would be subject to a comprehensive master planning exercise and this would include further necessary highway and transport work. It
continues to state that transport provision shall be delivered on a strategic basis, with transport infrastructure links between Paddock Wood, Tudeley Village, Tonbridge and Royal Tunbridge Wells.

4.15 It is worth noting that the subject site is currently one of the only sites that benefits from an already established and safe access onto the A228 (Whetsted Road). Subject to further investigation, this could provide a useful access point onto the wider development.
5 Conclusion

5.1 The site is in single ownership and represents an excellent opportunity to be part of the sustainable strategic urban extension to Paddock Wood. The site is available now, is entirely suitable and deliverable within the plan period. There are no legal or ownership constraints to delivery and when combined with the draft site allocation that bounds the site, the flood risk and Green Belt constraints do not prevent the delivery of the land.

5.2 Overall the site could contribute proportionally with other allocated sites for important infrastructure improvements. It represents a logical extension to the draft allocation. We would welcome the opportunity to work with the Council to develop the masterplan for Paddock Wood and to include the land at Tudeley Brook Farm.