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Tunbridge Wells Local Plan Regulation 18 Response

**In respect of land at Colebrooke House, Tunbridge Wells
On behalf of Axiom Developments Limited**

November 2019
DHA/14006/10953



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1 Introduction

1.1 Purpose of this report

- 1.1.1 This representation has been prepared on behalf of Axiom Developments Limited ('Axiom') - in response to the Tunbridge Wells Borough Council ('TWBC') Draft Local Plan Consultation, which runs until 15th November 2019.
- 1.1.2 These representations relate to land at Colebrooke House, Tunbridge Wells, which Axiom is promoting for commercial development as part of the TWBC Local Plan review.
- 1.1.3 Based on the current national and local planning context, we consider this site to be suitable for development and agree it should be allocated for development.
- 1.1.4 This representation therefore responds to the content of the draft plan (and relevant supporting documents); supports the proposed allocation of land at Colebrooke House, reinforcing why the site represents a suitable location to accommodate growth, and outlining how development could be delivered on site; and objects to the proposal to continue to include the land within the Green Belt.

2 Site context

2.1 Site overview

2.1.1 Our client is promoting land at Colebrooke House for a business park within an attractive parkland campus setting. The site was promoted via the original Call for Sites process in 2016 (site 101). The site boundary is shown in Figure 2.1.

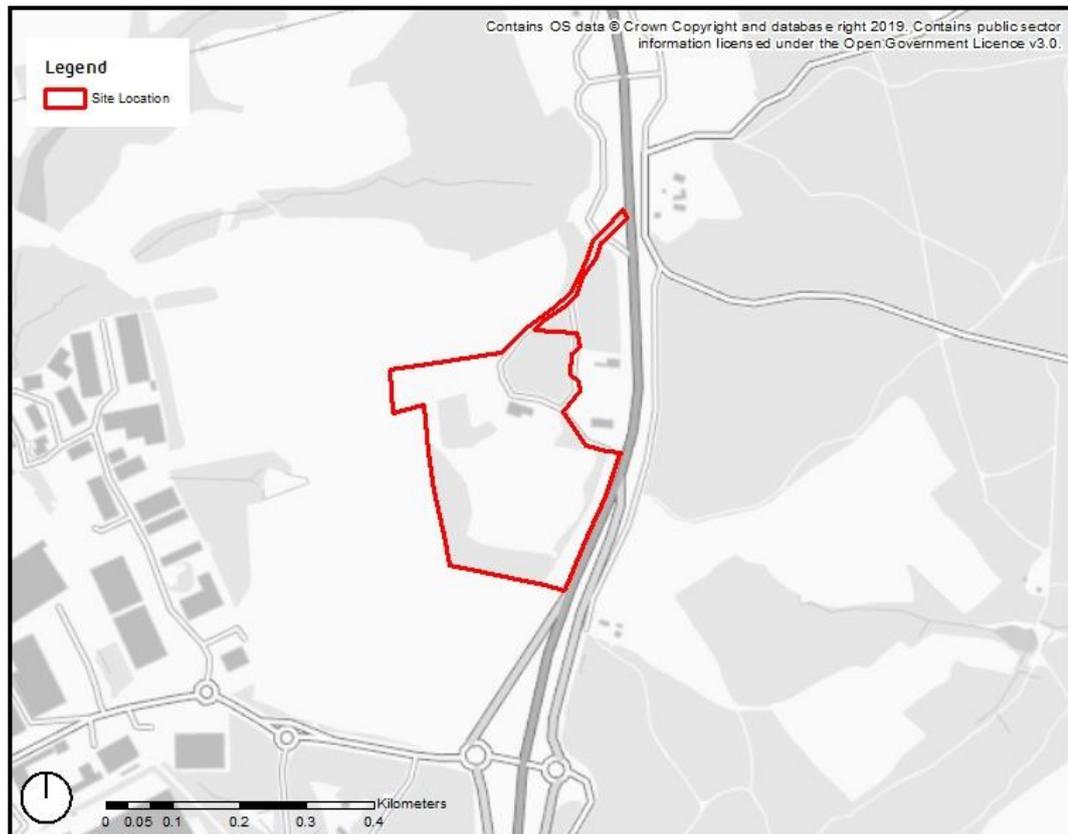


Figure 2.1: Proposed allocation site boundary

- 2.1.2 The site lies outside of the current settlement boundary for Royal Tunbridge Wells and within both the High Weald Area of Outstanding Natural Beauty (AONB) and the Green Belt.
- 2.1.3 As a result of the recent A21 dualling project, the site benefits from direct access onto the A21 via the Fairthorne junction. This has opened up the land to excellent access to the national road network, whilst also being well-located in relation to the existing employment areas along Longfield Road. The A21 improvements present an excellent opportunity for the site to make a substantial contribution to the local economy through development of the site.
- 2.1.4 The 8.5ha site comprises a large 19th century residential property set in parkland grounds. Whilst being habitable, the property is currently in need of repairs following a period of under-investment. Its value as a residential property has been substantially affected as a result of the A21 dualling works.

- 2.1.5 There is a unique opportunity to provide a high-quality business park set within an established parkland setting and based around the existing 19th century Colebrooke House which would be retained and converted for office use, giving the site a unique identity. Colebrooke House is an opportunity to provide an attractive business location, accessible to the A21 as well as local businesses and services. A Vision Document has been prepared which shows that the site would be capable of delivering around 11,750 sqm of office floorspace, which would be capable of supporting between 885 and 1,437 jobs depending on the intensity of their use. This Vision Document has previously been submitted on an informal basis, but is now formally submitted in support of these representations.
- 2.1.6 The site could be designed as an attractive standalone campus, suitable for occupation either by a single major occupier or as a premium office campus. It would be attractive to businesses within the financial and insurance industries that Tunbridge Wells specialises in, and could help to attract new businesses and/or retain existing ones looking to move or expand from poorer quality stock, or from buildings which are being converted to residential uses under permitted development rights.
- 2.1.7 The Council's Economic Needs Study demonstrates the need for good quality economic development land locally. This was also backed up by responses from stakeholders identifying Tunbridge Wells as a good office and industrial location. ENS paragraph 9.66 in particular identifies demand for offices, and especially higher quality Grade A accommodation in accessible locations, which is the type of development proposed at Colebrooke House. It would score well against all of the bullet points set out in ENS paragraph 10.29, i.e. excellent accessibility; public transport and parking availability; and it being an area with a critical mass of employment use and amenities which would be attractive to investors.
- 2.1.8 The development would have excellent strategic transport links to the newly upgraded A21 as well as providing opportunities to create and improve existing pedestrian, cycle and public transport links to North Farm, Tunbridge Wells and Tonbridge. Facilities such as a café/clubhouse could be provided on-site to reduce the need for workers to travel during the working day. Pedestrian, cycle and emergency access links could also be provided into the land to the west, which is also proposed for development as part of the Local Plan proposals.
- 2.1.9 In respect of deliverability, the site has no planning history of relevance nor a history of unimplemented permissions, and there are no known impediments to the sites being phased for potential development within the 0-5 year period. The site is within the control of a single developer and a single owner. Subject to the site's removal from the Green Belt in the Local Plan, there is an excellent opportunity to deliver a high-quality employment development scheme in the short term.

3 The Tunbridge Wells Draft Local Plan

3.1 Overview

- 3.1.1 The TWBC Draft Local Plan sets out the spatial vision, strategic objectives, and development strategy for the Borough. It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy, and detailed policies to be applied to all new development.
- 3.1.2 The plan will set the agenda for development across the Borough to 2036 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

3.2 Comments on Policy AL/RTW 13: Land at Colebrooke House, Pembury Road

Stance: Support with Conditions

- 3.2.1 Axiom supports Policy AL/RTW 13, which is generally in line with its early proposals for the commercial redevelopment of the site. We agree that the Council should be making the most of the opportunities presented by the A21 dualling improvements in terms of making Tunbridge Wells a more attractive business location and, therefore, attracting businesses currently based outside the Borough. This draft policy seeks to achieve this.
- 3.2.2 However, this support is subject to the comments and concerns set out below.

Site Name

- 3.2.3 The property is known as Colebrooke House, rather than Colebrook. There does appear to be an element of confusion, with both spellings being used in relation to different properties and addresses in the local area. However, Colebrooke is the correct spelling of the family who owned extensive land in the area in the 19th century, and both the Ordnance Survey and Royal Mail databases refer to the property as Colebrooke House. We therefore believe this to be the correct spelling and request that the property name is amended accordingly.

Quantum of development

- 3.2.4 We note that the site has been allocated to provide approximately 10,000sqm of B1, B2 and B8 development. As noted in section 2, we have produced a Vision Document which demonstrates that a slightly higher quantum of development – around 11,750 sqm – could be achieved on this site. We request that the draft policy is amended to reflect this.

Type of development

- 3.2.5 The current draft policy reflects Axiom's vision for the site, in proposing B1, B2, B8 and ancillary uses and this is supported. However, it is conceivable that the campus nature of the proposed development site could also be attractive to other non B-class forms of employment use – for example, further/higher education. In

accordance with the requirement at paragraphs 11(a) and 81(d) for Local Plans to provide flexibility, we request that the policy is worded in such a way as to allow other appropriate employment-generating uses at the site. For example, the introductory paragraph to Policy AL/RTW 13 might be amended to read:

This site, as defined on the Royal Tunbridge Wells draft Policies Map, is allocated for employment uses to provide approximately 11,750sqm of accommodation and ancillary facilities, delivered through conversion of Colebrook House, together with a modern business park in a campus layout that respects the existing parkland setting. Acceptable uses will include business (B1), general industry (B2), storage and distribution (B8), and other employment-generating uses appropriate to this location.

Green Belt Status

Comment on paragraph 5.29

- 3.2.6 Axiom **objects** to the proposal to retain the site within the Green Belt, rather than to remove it from the Green Belt as is proposed on the neighbouring allocation under policy AL/RTW 12. The proposed retention of the site within the Green Belt is unacceptable for the following reasons:

Retaining the site within the Green Belt will hinder investment.

- 3.2.7 The Council has identified the site as being suitable for development to help meet the Borough's qualitative and quantitative economic development needs. As discussed further below, it is important that the market has a choice of economic development sites. Colebrooke House provides a different offer to that available on the neighbouring AL/RTW 12 allocation, in that it can provide a high-quality office park based on an existing property whilst retaining and improving an existing parkland setting.
- 3.2.8 However, by retaining the site within the Green Belt, the Council is making it necessary for any applicant to demonstrate very special circumstances for development in the grounds of Colebrooke House. This leads to uncertainty as to whether or not the allocation can be relied upon, which will deter investment and lead to uncertainty about its delivery. This is not a sound approach for the Local Plan to take.
- 3.2.9 Developers and potential occupiers will be concerned about the additional planning hurdles and the uncertainty created by having to make a very special circumstances case for development. Businesses do not like uncertainty. They are likely instead to prefer to pursue alternative sites without a Green Belt restriction, whether in Tunbridge Wells Borough, or indeed elsewhere.

This site only makes a very limited contribution to the purposes of the Green Belt

- 3.2.10 The site falls within parcel TW4 as considered in the Council's Green Belt Study. This is the same parcel as the neighbouring allocation AL/RTW 12 which, unlike Colebrooke House, is proposed to be removed from the Green Belt.

- 3.2.11 As expanded upon in further detail in section 3.4 below, we consider that the site makes a lower contribution to the purposes of the Green Belt than suggested in the Green Belt Study. In any event, the site is in the same parcel and so scores the same as the neighbouring allocation AL/RTW 12 in this respect.

Removing the site from the Green Belt would provide a stronger and more defensible Green Belt boundary.

- 3.2.12 As noted in further detail in section 3.4 below, we agree with the conclusion in the Green Belt Study that the A21 would make a stronger Green Belt boundary. In contrast, the Council's proposed Green Belt boundary does not follow any strong physical features.

- 3.2.13 NPPF paragraph 139(f) states that Local Plans should define Green Belt boundaries clearly, "using physical features that are readily recognisable and likely to be permanent".

- 3.2.14 For these reasons, we have proposed an alternative Green Belt boundary as described in paragraph 3.5.5 and shown in Figure 3.5.

The Distribution of Development Topic Paper analysis does not provide any justification for retaining the site within the Green Belt.

- 3.2.15 The justification for removing AL/RTW 12 from the Green Belt, as set out on page 38 of the Distribution of Development Topic Paper, would apply equally to the Colebrooke House site.

- 3.2.16 Sites AL/RTW 12 and AL/RTW 13 are then considered in more specific detail in the table on p20 which purports to provide the rationale for deciding whether sites are retained in or removed from the Green Belt. The rationale specified in both cases is identical:

"Provides employment in sustainable location; A21 provides strong MGB¹ boundary; Well Wood to north marks Green Belt edge on adjacent development."

- 3.2.17 Yet AL/RTW 12 is partly removed from the Green Belt whilst AL/RTW 13 is retained within it. There is no justification whatsoever provided in the Topic Paper to justify the different stances being taken in each case, especially when doing so will hinder investment and development at Colebrooke House.

There is a clear need to release sites for economic development, and this is an appropriate site.

- 3.2.18 As noted above, the Green Belt designation will hinder the development of this site. Yet it is clear that there is a compelling need for employment development in Tunbridge Wells.

- 3.2.19 The Council's Economic Needs Study recognises that the A21 dualling as well as other recent highway infrastructure improvements in the North Farm area could

¹ Metropolitan Green Belt

further unlock potential future allocations for employment growth. We strongly support this view and urge the Council to get best value from these infrastructure improvements by allowing well-designed development in what is a clearly attractive and accessible location for businesses, such as at Colebrooke House. Whilst the ENS summary at 6.94 refers to the infrastructure improvements being a catalyst for further investment, this will only happen if the right sites are allocated. If sites aren't attractive to businesses, or are too slow to deliver, businesses will simply go elsewhere to the detriment of the local economy.

- 3.2.20 We attended the Tunbridge Wells Stakeholder Workshop referred to in the ENS and agree that the key findings included the lack of supply of land and premises acting as a disincentive to potential investors and constraining the growth of existing businesses (a point that we note has also been raised separately by Locate in Kent). The workshop identified the need to address local transport and congestion issues especially around North Farm (where significant improvements have been made) and workshop attendees identified the potential of the North Farm/A21 corridor for economic growth. The allocation for development at Colebrooke House is fully in line with the findings of the ENS and the Stakeholder Workshop. Furthermore, North Farm is already recognised as a well-established employment location. Allocating further development nearby increases the potential for business-to-business services further enhancing the local economy.
- 3.2.21 However, the continued inclusion of Colebrooke House within the Green Belt represents an unnecessary hurdle which will hinder investment.

The Council's Economic Development Strategy and Economic Needs Study support these conclusions.

- 3.2.22 The Council's Economic Development Strategy 2018-2021 concludes, amongst other things, that:
- (1) A shortage of sites and premises is a major constraint for local businesses and is also a barrier to inward investment from outside the Borough;
 - (2) The shortage has been exacerbated due to the conversion of floorspace from office to residential under Permitted Development legislation, particularly in Royal Tunbridge Wells town centre;
 - (3) The Council's Economic Needs Study recommends, amongst others, employment sites in areas close to main arterial roads (e.g. the A21) where accessibility to the highway network for business operations is quick;
 - (4) Current weaknesses in Tunbridge Wells include traffic congestion in urban areas, a shortage of sites, and ageing office stock;
 - (5) Current threats include limited opportunity for additional road capacity; out commuting, especially of the highly skilled; and pressure for residential development over employment uses; and
 - (6) Opportunities for Tunbridge Wells include the new Local Plan process, as this can provide new employment allocations, therefore improving the amount of land available for economic development and ensuring that such land is located where it is attractive to the market.

The Council's Office Market Review also recognises serious issues with office provision in Tunbridge Wells town centre and recommends considering provision in the A21 corridor (and the Council's decision not to proceed with the Calverley Square civic centre project has compounded the problems).

3.2.23 The Council's Office Market Review, which is part of the evidence base to this Local Plan, notes on p.28 that:

- (1) There is limited supply of office space on the A21 corridor;
- (2) The majority of available space locally is in Maidstone and Kings Hill (Tonbridge & Malling) with the latter offering modern, well-specified space with excellent parking provision in a business park location;
- (3) "There is a significant danger that if there is no suitable available office space in the [Tunbridge Wells town centre] Study Area, particularly for larger employers, and where MEES requirements are an issue,² then relocation out of Royal Tunbridge Wells will be a necessity unless sites outside the Study Area, for example on North Farm's industrial estate, are considered."

3.2.24 The study's conclusions on p.33 include:

- (1) The current town centre office market comprises mainly old stock, which is unlikely to become available and/or does not meet modern standards;
- (2) A substantial amount of office space has been lost as a result of the office to residential permitted development rights: 22% of May 2013 office stock had already been lost at the time of publication (Feb 2018) and a permission is in place for a further 22% to be lost;
- (3) Less than 8,000 sq ft of office space is available, with much of that being old, limited and/or lacking parking;
- (4) The only potential opportunities to replace lost office space are the new civic centre development [which in October 2019 the Council voted not to proceed further with]; redevelopment of the Town Hall [which was dependent on the civic centre project] and new development in the Vale Avenue Area of Change [which has seen some refurbishment and extension, but also a loss of existing buildings to hotel and residential use, further compounding the problem]; and
- (5) The North Farm / A21 corridor area should be considered for new office development.

3.2.25 Colebrooke House is of course in the A21 corridor and has rightly been recognised in the draft Local Plan as being appropriate for economic development. It should be noted there are no significant opportunities for office development in this location on sites which are outside the Green Belt, since this currently washes over all undeveloped land in this area. It now needs to be removed from the Green

² The MEES (Minimum Energy Performance Standards) Regulations have made it unlawful since April 2018 to let buildings which do not achieve minimum Energy Performance Certificate standards. Whilst this applies initially to new lettings and renewals only, from April 2023 it will apply to all existing leases.

Belt to allow the appropriate re-development of the site in accordance with draft Local Plan policies.

There is a need for a choice of economic development sites to be provided.

- 3.2.26 NPPF paragraph 80 emphasises the need for planning policies to create conditions to allow businesses to invest, expand and adapt. This approach “should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”.
- 3.2.27 Paragraph 81 then requires planning policies to set out a strategy “which positively and proactively encourages sustainable economic growth”, having regard to local economic development strategies.
- 3.2.28 New commercial development must meet the needs of the market by providing development opportunities in the right places to meet current and future demand. This should include the provision of commercial development around appropriate strategic road network junctions, amongst other locations.
- 3.2.29 If Tunbridge Wells is to reach its full economic potential, new business land and locations are required in order to meet currently unmet needs, allow existing businesses to relocate to expand, and to attract new businesses to the Borough.
- 3.2.30 It is currently proposed to meet the economic development needs of those businesses seeking a location near the strategic road network on a single site in Tunbridge Wells – the adjacent proposed AL/RTW 12 allocation. Whilst we agree that is a logical and appropriate site to develop for commercial floorspace, it would be unwise to rely on a single site coming forward to meet the identified need, for the following reasons:
- (1) If, for whatever reason, that site doesn’t come forward in the manner envisaged, or indeed at all, there will be no other sites on which that specific need can be met;
 - (2) The Economic Needs Study and Office Market Review have identified that there is a need for employment floorspace close to the A21, a conclusion with which Axiom fully agree;
 - (3) Assuming that AL/RTW 12 is allocated, having more than one development site option in this area provides competition for the market, which assists affordability and therefore delivery. It also stops the Council’s economic strategy being frustrated by a lack of choice;
 - (4) NPPF paragraph 82 recognises the need for a variety of sites to be provided, noting that provision should be made to address the requirements of different sectors, including making provision “at a variety of scales and in suitably accessible locations.”; and
 - (5) A greater variety of allocated sites allows a greater range of employment buildings, sizes and types to be offered in a wider variety of locations. This makes it more likely that interested companies will find the space that they want within Tunbridge Wells Borough, assisting growth and boosting the local economy. As noted previously, the character of the Colebrooke House

site is very different to that of the neighbouring AL/RTW 12 site, enabling a very different type of office campus to be provided. Local plans are very good at providing a wide range of housing sites and locations, providing choice in the market. By contrast, the number of options available to companies looking to expand or relocate is much smaller. This needs to be rectified.

- 3.2.31 To ensure the benefits of economic growth benefit everyone, new commercial provision should be well placed to serve a skilled workforce and to meet the needs of businesses. Whilst it is appropriate for some employment development to be provided in the most accessible locations such as town centres, new provision should also be made close to the strategic road network to meet the needs of businesses, discourage out commuting, reduce congestion on routes into the town centre and offer new opportunities for local people to live and work in the Borough.
- 3.2.32 Whilst it is recognised that there are other economic development proposals elsewhere in the Borough, including at Paddock Wood and Gills Green, these are locations which are likely to be less attractive to the office market and are less well related to the strategic road network.
- 3.2.33 Paragraph 11 of the Executive Summary to the ENS identifies an Objectively Assessed Need for at least 14ha of employment land and this target is referred to throughout the Local Plan and in the Distribution of Development Topic Paper. However, the ENS goes on to recommend identifying a greater quantum of land in recognition of market interest and to provide a sufficient choice of sites for prospective occupiers and investors. ENS paragraph 8.88 recommends that 20ha of new employment land should be allocated. This supports our view that a proper choice of sites must be provided. This should include Colebrooke House, as the Local Plan recognises, which means it should also be removed from the Green Belt.

Release of the site from the Green Belt is required to enable the strategy in policy STR/RTW 1 to be delivered

- 3.2.34 This policy, amongst other things, requires 90,000 sqm of employment floorspace to be delivered, including at Colebrooke House. The site therefore needs to be released from the Green Belt to ensure that such development is not hindered. For the reasons set out above, safeguarding the site's Green Belt status will mean that development will not be attracted to the site, and the Council's economic development strategy will not be fully realised, making this element of the plan unsound.

Development at Colebrooke House would make best use of a partly brownfield site and so should be prioritised over purely greenfield sites.

- 3.2.35 NPPF paragraph 84 notes that "the use of previously developed land, and sites that are physically well related to existing settlements, should be encouraged where suitable opportunities exist."
- 3.2.36 Colebrooke House is, in part, previously developed land.

- 3.2.37 This provides a clear and compelling reason to remove Colebrooke House from the Green Belt and prioritise its delivery for economic development over purely greenfield locations.
- 3.2.38 As currently drafted, the Local Plan effectively prioritises delivery of development on the open greenfield adjacent site AL/RTW 12 over Colebrooke House since RTW 12 is to be removed from the Green Belt and Colebrooke House is not. We note that there is no analysis in the Local Plan to show why RTW 12 has been prioritised over Colebrooke House in this way.
- 3.2.39 If there is going to be a policy difference between the two sites (and we would argue that a differing approach is unnecessary), the Plan should instead prioritise the part-brownfield, well-screened Colebrooke House site over development of the whole of the greenfield, open site at RTW 12. As demonstrated elsewhere in these representations, and as illustrated in Figure 3.1 and Figure 3.2 below, the neighbouring site RTW 12 is a large one which is much more visible from the surrounding highway and footpath network. It also relies upon highways access onto the more congested Longfield Road, whereas Colebrooke House enjoys what is in effect almost a private, direct access onto the A21.



Figure 3.1: View from A21 towards the currently open land at proposed allocation AL/RTW 12



Figure 3.2: The well-screened Colebrooke House site, which is completely invisible from the A21

The site is almost invisible from outside the site boundaries

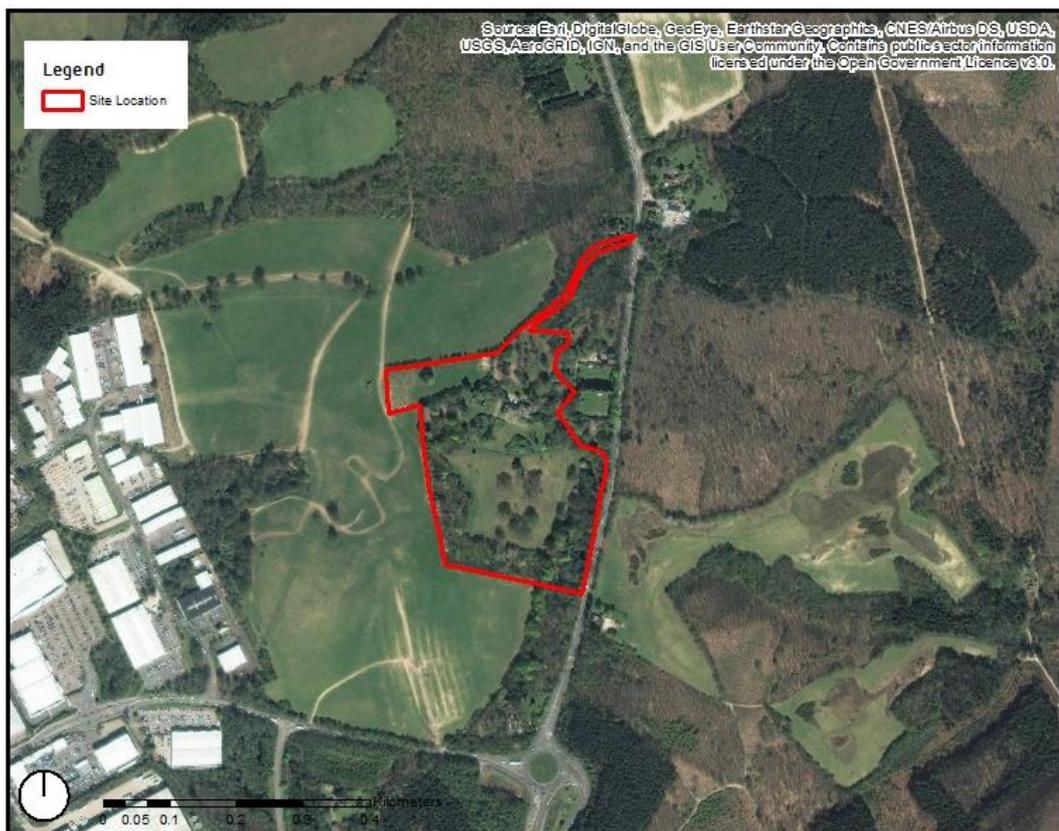


Figure 3.3: Aerial photograph of the site, showing the site is entirely surrounded by trees rendering it invisible from outside the site

- 3.2.40 As Figure 3.2 and Figure 3.3 make clear, the site is surrounded by well-established and mature trees which means there is no visibility into the site. Indeed, despite being adjacent to the busy A21, people passing the site would not even know that the existing house was there. The submitted Landscape Study (p38) confirms that if three storey buildings were developed on the site, these would not be visible from beyond the site boundaries.
- 3.2.41 This is a further reason why, if Green Belt and AONB land is to be released for development, priority should be given to well-located sites with the least harmful effects. Developing a site which is (and will continue to be) so well screened allows best use to be made of a prime employment location without unnecessary harm to the local landscape.
- 3.2.42 Unlike the adjacent AL/RTW 12 site, there are no public rights of way crossing the Colebrooke House site, and so there is no risk of walkers' views being affected by development on this site.

Release of this site from the Green Belt is compatible with NPPF paragraph 138

- 3.2.43 NPPF paragraph 138 notes that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. This provides another clear reason to prioritise development at Colebrooke House over wholly greenfield sites.
- 3.2.44 As noted above, the Colebrooke House site is, in part, previously developed. Longfield Road is already served by public transport. It would be possible to further enhance this, either through improved bus provision e.g. extending the existing bus routes, and/or by introducing innovative new services which meet the needs of office parks.
- 3.2.45 An example of the latter is the PickMeUp shuttle bus service which operates at the Oxford Science Park.³ This is an app-based on-demand ride-sharing minibus service which provides direct public transport access between any two points within a defined service area covering much of eastern and southern Oxford. The service has proved successful since being launched in 2018 and has since been expanded to cover a greater area.

Vehicular Access

- 3.2.46 As set out in the Vision Document, the historic main driveway has been reinstated as a result of the A21 works and provides an attractive and direct link to the new A21 Fairthorne junction, as required in the draft policy. Further improvements will be made to this access to accommodate the development.
- 3.2.47 This is another reason why development should be prioritised at Colebrooke House, as it enjoys its own direct access onto the little-used new Fairthorne junction on the A21. This ensures that, in contrast to site RTW 12, no new vehicular access is required onto the busy Longfield Road, minimising congestion. The Colebrooke House driveway also provides direct access to the new Non-Motorised

³ <https://pickmeup.oxfordbus.co.uk/>

Route between Pembury, Longfield Road and Tonbridge which was constructed as part of the A21 works to enhance pedestrian and cycle links locally.

Pedestrian and Cycle Access

- 3.2.48 We confirm that the development will include good pedestrian and cycle links. We note that draft policy AL/RTW13 criterion 2 should refer to Policy RTW 12, not 13, when discussing links to the neighbouring site.

Heritage

- 3.2.49 Axiom's proposals for the site include the retention of Colebrooke House as suggested in the draft policy.

- 3.2.50 A Heritage Assessment has already been carried out and has been provided to the Council on an informal basis. We are also formally submitting this with these representations. This assesses the draft proposals set out in the Vision Document and concludes that:

- The proposed alterations to the main house will not alter the character or significance of this non-designated heritage asset;
- The proposed office campus has been designed to minimise impacts on the landscape and retained 19th century house;
- The scheme protects the historic character of Colebrooke House, enlarging or reinstating lost grounds to the south of the house and reinforcing the essence of the original park environment; and
- The new planned landscape, perhaps echoing its historic predecessor in the creation of woodland and clearings linked by a network of paths, could provide opportunities for those working within the campus to enjoy the landscape, the retained elements of the park, thus benefiting from an integration of that historic landscape into the proposed working environment.

Landscape

- 3.2.51 A Landscape and Visual Appraisal has been carried out and provided to the Council on an informal basis. We are also formally submitting this with these representations. This assesses the draft proposals set out in the Vision Document and concludes that:

- The area of and immediately around the site is completely enclosed by woodland blocks in the wider landscape and also by the trees within the site. Its location on a west-facing slope, with the A21 immediately to its east, means that it is visually associated with the urban edge of Tunbridge Wells to the west and does not appear as part of the wider countryside to the east;

- The area around the site has been significantly affected by the A21 improvement works, and is also affected by the visible edge of Tunbridge Wells to the west, with its large-scale commercial buildings;
- Assuming that the development would comprise well designed office buildings of no more than three stories in height, and that the mature parkland trees would be retained, the site has been assessed as of low to medium sensitivity to development of the type proposed;
- TWBC have conducted studies of landscape sensitivity and contribution to the purposes of including land within the Green Belt of the land around the town, in order to identify areas which may potentially be suitable for development and release from the Green Belt. Those studies have found that the site and the area to its west are of relatively low sensitivity and importance to Green Belt purposes in comparison with the other areas considered, and concluded that the area including the site 'relates more strongly to the settlement than to the wider countryside';
- Access for the development would be from the new A21 Fairthorne junction to the north, utilising the existing tree-lined drive into the site. All significant perimeter vegetation would be retained and protected during construction, as would the mature parkland trees. The proposed office buildings would be no more than three storeys in height and would therefore be lower than the trees within and around the site;
- While the area of the site itself would change significantly, from being an area of open parkland relating to the house to its north, to a high quality office campus in parkland setting, the degree of change to the local landscape around the site brought about by the proposed development would be negligible;
- The anticipated overall effects on the local landscape would be slight adverse at their greatest, in the winter soon after completion. Effects in the summer and over time as the proposed planting matures would be insignificant, as the proposals generally fit the landform and scale of the landscape, would have limited effects on views, can be mitigated to a reasonable extent and would avoid significant effects on designated landscapes. Effects after around 10 years would be expected to be neutral;
- That part of the AONB lying within the site would be affected by the development, and there would be a significant change to the landscape of the site. However, while there would be some inevitable landscape effects within the site itself, there would be no significant effects on the wider landscape of the AONB or upon the character of the AONB. The proposals would involve medium scale development within the AONB, but any harm in that respect would be offset by the enclosed nature of the site and by the proposed high-quality design and retention of perimeter woodland and parkland trees; and
- There would be some generally low level harm in terms of the purposes of including land within the Green Belt, but the TWBC study has shown that harm would be at a lower level in the case of the area including the site than for most other parcels of land around Tunbridge Wells.

Safeguarded Waste Management Facilities

- 3.2.52 We do not understand the purpose of criterion 9, which requires any application to demonstrate that there will be no material adverse impact on the operation of safeguarded waste management facilities. We are not aware of any safeguarded waste management facilities on or adjacent to the site and assume that this has been added in error. **Criterion 9 should therefore be deleted.**

3.3 Comments on Proposals Map

- 3.3.1 As set out in section 3.4 below, we request that the Green Belt boundary is amended to include site AL/RTW 13 for the reasons set out in these representations.
- 3.3.2 It is noted that the proposed Limits to Built Development have, correctly and sensibly, been drawn to include the proposed Colebrooke House allocation. We support this amendment, though we have also suggested further amendments as set out in section 3.4 below. It would make much more sense for the Limits to Built Development and Green Belt boundaries to be consistent here.

3.4 Comment on Paragraph 6.160

- 3.4.1 Paragraph 6.160 states:

*"...The Council will assume a buffer of **25m** from the edge of [ancient] woodland expecting through assessment for developers to confirm that this or any other distance is appropriate and that the priority for such buffers will be ecological mitigation and enhancement for the woodland rather than the amenity of the proposed development."*

- 3.4.2 The advice from the Government's statutory advisor on biodiversity, Natural England, states that:

*"For ancient woodlands, you should have a buffer zone of at least **15 metres** to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone."*⁴

- 3.4.3 The Council has provided no justification for imposing a new starting point of 25m, which is nearly double the standard minimum requirement set out by Natural England. This increased buffer zone does not appear to have been based on any evidence. It will simply reduce the quantum of development that can be achieved on many sites, which will in turn increase the risk that additional land is likely to be required elsewhere to meet development needs. We **object** to this proposed buffer, and request that the standard accepted minimum distance of 15m should be stated instead.

3.5 Comments on Green Belt Study

- 3.5.1 Proposed allocation site AL/RTW 13 falls within parcel TW4 as considered in the Council's Green Belt Study. This is the same parcel as the neighbouring allocation

⁴ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

AL/RTW 12 which, unlike Colebrooke House, is proposed to be removed from the Green Belt.

Contribution to Green Belt purposes

3.5.2 In terms of the parcel's contribution to Green Belt purposes, we note that:

- The parcel makes a **weak/no contribution** to the purpose of preventing neighbouring towns merging into another. We agree that this site makes no contribution to this purpose.
- The parcel makes a **relatively weak** contribution to preserving the special character of historic towns. We disagree with this conclusion, and consider that the site makes **no contribution** to this Green Belt purpose. Indeed the text of the Green Belt study itself notes that "the industrial edge of Tunbridge Wells lacks relationship with the historic town centre".
- The parcel makes a **relatively weak** contribution to the purposes of assisting in safeguarding the countryside from encroachment. We agree with this assessment.
- The parcel makes a **moderate** contribution to the purpose of checking the unrestricted sprawl of large built up areas. We do not disagree with this assessment in terms of the parcel as a whole but note that this would apply equally to most areas of predominantly greenfield land. In relation to site RTW 13 specifically, which is partly previously developed land, we would argue that it makes only a **relatively weak** contribution to this purpose. The newly dualled A21 is the real physical boundary, as discussed further below.

Green Belt boundary strength

3.5.3 We agree with the conclusion that "the A21 would constitute a stronger boundary to the east". It is noted that the proposed Green Belt boundary ignores this recommendation and instead proposes to place the Green Belt boundary between draft allocation sites AL/RTW 12 and AL/RTW 13, as shown in Figure 3.4.

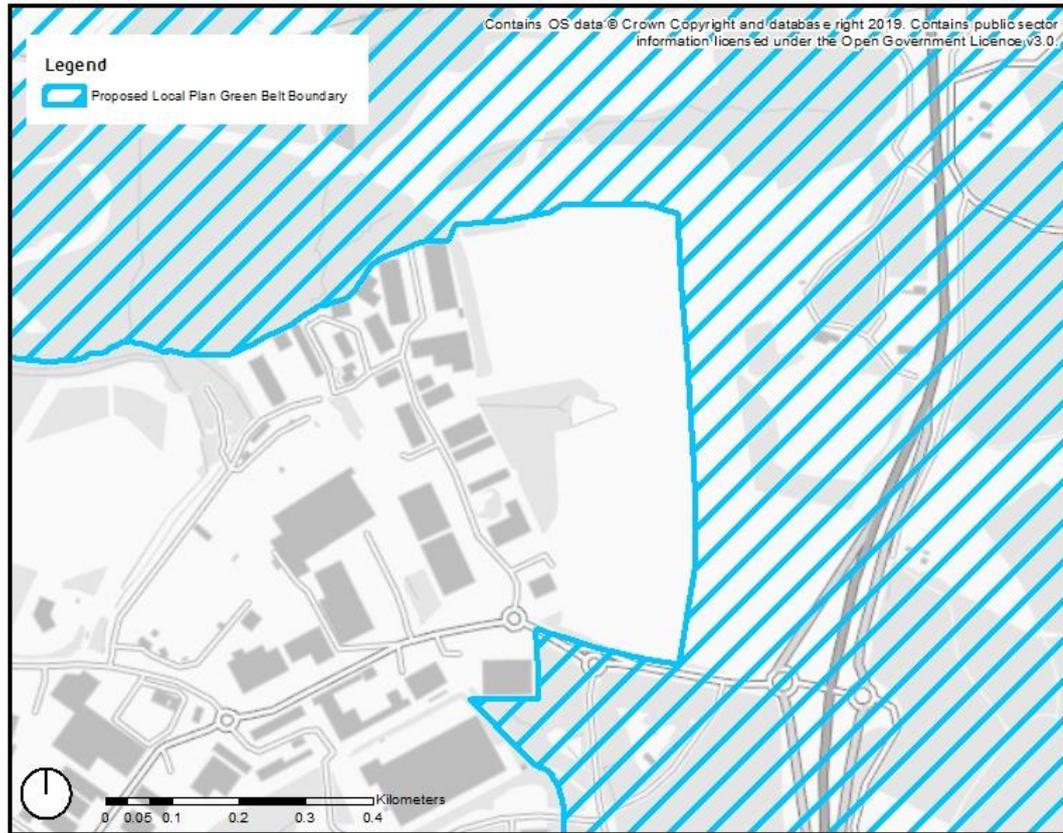


Figure 3.4: Reg 18 draft Local Plan – proposed Green Belt boundary

- 3.5.4 The proposed Green Belt boundary does not follow any obvious features, but is tight to the boundary of the proposed allocation site AL/RTW 12.
- 3.5.5 We consider that the Green Belt boundary should be amended to include proposed allocation AL/RTW 13 up to the A21, which is a much stronger and more defensible boundary. At the very least, the boundary should be consistent with the proposed Limits to Built Development as shown on the draft Proposals Map.
- 3.5.6 That said, we consider that both the Green Belt and Limits to Built Development boundaries should be altered to include:
- The vehicular access to Colebrooke House; and
 - The residential properties immediately adjacent to Colebrooke House, between the site and the A21. Not only would this form a more natural and defensible boundary, bearing in mind both additional properties also comprise previously developed land, but also this would allow future flexibility.
- 3.5.7 Our proposed boundary is shown in Figure 3.5 below.

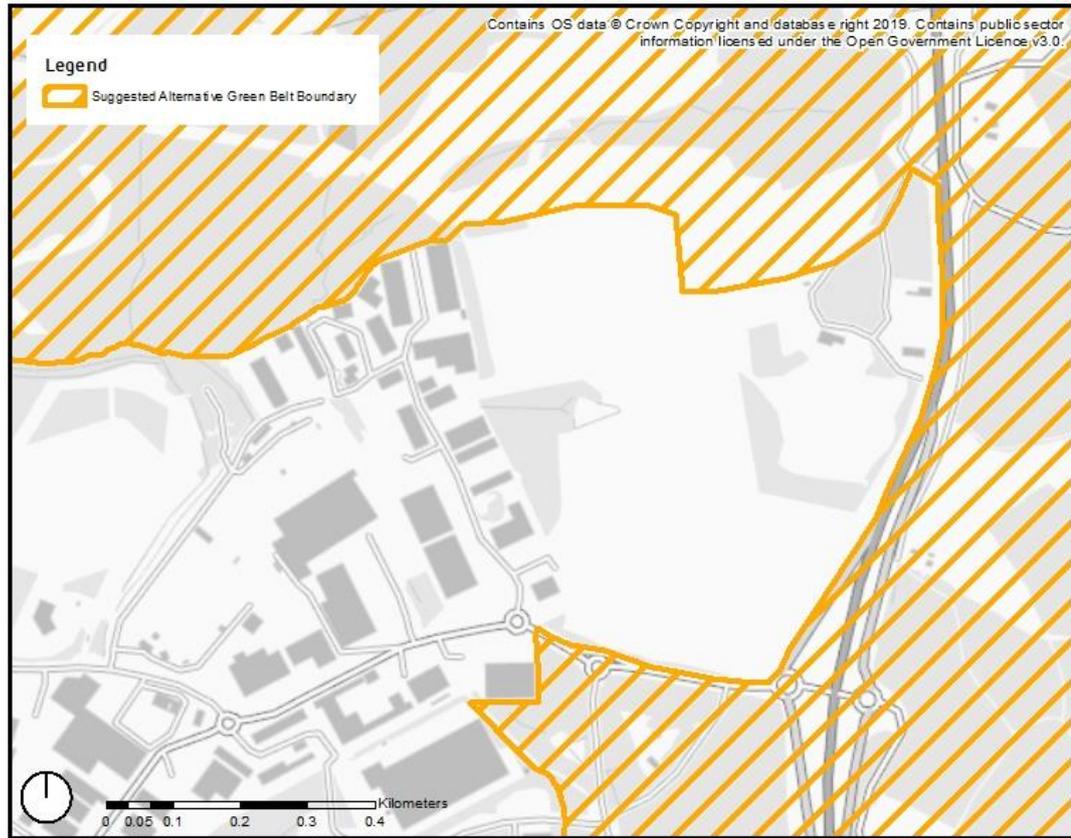


Figure 3.5: Axiom’s proposed Green Belt boundary, taking account of existing defensible boundary features

3.6 Comments on Sustainability Appraisal

3.6.1 We have compared the scoring attributed to Colebrooke House (site 101) with that of the neighbouring proposed allocation on Longfield Road (site 57). There appear to be inconsistencies in relation to how the sites have been treated with no clear explanation as to how this has come about. In particular:

- Colebrooke House scores '0/-' for air quality, yet the adjacent site receives a '0' score, despite being a much larger development which would generate significantly more emissions. We note the purported explanation on the table that the lower score is due to Colebrooke House’s direct vehicular access with the A21, making extensions to bus routes serving the retail park more cumbersome and encouraging car use. There is a clear opportunity for pedestrian links into the neighbouring site to make use of any buses serving that site, but also as set out in section 3.2, there are opportunities to make use of new technology to support a shuttle bus service which could serve the town centre and local railway stations.
- Colebrooke House scores 0/- for biodiversity, yet the adjacent site receives a 0 score. Both sites include areas of woodland and habitat, so it is not clear why the sites score differently in this respect.