Local Plan
Planning Policy
Planning Services
Tunbridge Wells Borough Council
Town Hall
Royal Tunbridge Wells
Kent
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Dear Sir / Madam

TUNBRIDGE WELLS LOCAL PLAN - REPRESENTATIONS ON BEHALF OF BELLWAY

We write on behalf of our client, Bellway Homes Strategic, in relation to the Regulation 18 draft Local Plan for Tunbridge Wells Borough which is currently subject to public consultation. This letter provides the background to Bellway’s interest in the Borough and sets out representations on their behalf.

BACKGROUND

Bellway has a legal interest in the land to the north and south of High Woods Lane (Mouseden Farm) on the eastern edge of the built up area of Tunbridge Wells/Hawkenbury which it is promoting for residential led development. The land promoted by Bellway is identified on the plan at Appendix 1 of these representations. The site is separated by High Woods Lane. The area south of High Woods Lane is currently in agricultural use and bordered to the east by woodland, to the south by existing sports uses and to the west by existing residential development. The area north of High Woods Lane is also within agricultural use, with further agricultural uses/woodland to the east and an indoor bowls club and allotments to the west.

The adopted Proposals Map indicates that both parts of the site are within the Green Belt and AONB.

On the basis of the Proposals Map published as part of this consultation indicates that the southern part of the land (south of High Woods Lane) is to be designated under Policy RTW23 with that area to adjoin the ‘Proposed Limited to Built Development’. The northern part of the land promoted by Bellway is not subject to any other proposed designations. The draft Proposals Map appears to indicates that both parts of the site will continue to be located within the Green Belt and AONB (although the resolution of the Proposals Map published as part of the consultation is very low quality).

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In 2017 Tunbridge Wells Borough Council itself submitted an application in relation to the land south of High Woods Lane. This application (17/03232/FULL) proposed the following development:

“Change of use of part of land to expand existing recreational facilities through provision of additional sports pitches, together with associated access, car parking provision, ‘ball stop’ fencing, changing room facilities and other works”

Application 17/03232/FULL was granted on 20th December 2017 and the permission is subject to a standard condition that development shall be begun before the expiration of 3 years from the date of the decision. The permission is also subject to a number of conditions which require details to be approved prior to the commencement of development.

It is clear from the application form that the Borough Council, as applicant, did not control the land required to deliver the abovementioned development.

In the period since permission was granted, we understand that the Borough Council has made no attempts (through any procedural mechanism) to acquire the land. Furthermore, the Borough Council’s website does not indicate that any submissions have been made to discharge pre-commencement conditions.

These representations are also accompanied by an Outline Landscape, Visual and Green Belt Advice Note prepared by Turley on behalf of Bellway. This demonstrates that the contribution made by the site to the Green Belt purposes has been overstated. This note also demonstrates that views of the Site from the surrounding landscape to the east, including the wider extent of the High Weald AONB are limited by the mature vegetation within High Wood and the ridgetop topography;

MASTERPLAN

In order to demonstrate that this site can accommodate development, an illustrative masterplan has been prepared. This demonstrates that residential development would be located to the north of High Woods Lane, with this area also accommodating a network of open spaces and planting. To the south of High Woods Lane the masterplan demonstrates how sports pitches can be accommodated in this area.

Bellway is capable of facilitating the delivery of the sports pitches within the wider site promoted via these representation in conjunction with residential development at the site. Bellway would be willing to enter into dialogue with the Council as to how this site could be delivered whilst providing the sports pitches. Bellway would be willing to then transfer the recreation and sports facilities to the Borough Council. The application for the sports pitches (made by the Borough Council) explained that the additional provision would help to remedy shortfalls present in the area in youth pitch provision.

As these representations advocate, the emerging Local Plan should be revised to include a policy which seeks to facilitate the recreation and sports facilities at this site, provided in conjunction with and facilitated by, residential development at the wider site. Bellway would be willing to engage with the LPA regarding the wording of any such policy.

REPRESENTATIONS

Housing Requirement and Supply
Table 1 of the draft Local Plan indicates that a total of 13,560 dwellings are required in the Borough between 2016 - 2036. Paragraph 4.7 of the Plan explains that this is calculated on the basis of 678 dwellings per annum to reflect the ‘standard method’. The requirement is to be achieved via the following sources:
Completions April 2016 to March 2019: 1,552 dwellings

Extant planning permissions at 1 April 2019: 3,127 dwellings

Outstanding site allocations: 588 dwellings

A windfall allowance of 700 dwellings (50 per annum from 2022 – 2036)

The draft Local Plan indicates that these sources of supply leave a minimum still to be identified of 7,593 dwellings.

We agree that the ‘standard method’ should be used to calculate the Local Housing Need figure (unless an alternative approach could be justified) in accordance with paragraph 60 of the NPPF 2019. It is clear from the ‘Housing Needs Assessment’ Topic Paper (August 2019) that the Council has applied a ‘cap’ to reflect the Planning Practice Guidance when calculating the Local Housing Need figure. The Topic Paper indicates that if this cap were not applied then the Local Housing Need figure would equate to 749 dwellings per annum in order to reflect an uplift to reflect affordability.

The Housing Needs Assessment Topic Paper itself therefore acknowledges that the level of growth planned in the emerging Local Plan is not at a level which would address the inherent issues of affordability. The Topic Paper acknowledges that house prices continue to increase and are relatively high for Kent, with affordability ratios also “relatively high”. On this basis, Bellway consider that the housing requirement should be increased in order to help tackle the identified issues of housing affordability in the Borough. In the event that the housing requirement is not increased in this manner then this only heightens the imperative of ensuring that the Local Plan establishes a planning policy context, by virtue of the sources of supply, allocations and distribution strategy which ensures that the planned level of growth can be achieved.

Notwithstanding the comments set out above, Bellway have significant concerns regarding the approach which the Council is pursuing to meet the housing needs in the Borough.

**Windfalls**

Irrespective of whether or not a windfall allowance is justified, and the extent of the allowance, Bellway note that the Council expects 700 dwellings (50 per annum) to be delivered from this source. This equates to nearly 10% of all the remaining housing to be delivered once existing commitments have been discounted. Since the total supply envisaged by the Local Plan exceeds the requirement by 9%, this reliance on windfall sites represents a significant risk to the overall requirements being achieved if any other sources of supply were to slip or be delayed.

Given the concern set out above, we consider that the Council should plan for greater flexibility in the event that sites/sources of supply do not deliver as expected.

**Housing Trajectory**

The ‘Housing Supply and Trajectory’ Topic Paper explains that the Local Plan makes provision for 14,776 dwellings during the Plan period (including existing commitments) (a buffer of 1,216 compared to the standard method requirement of 13,560). On the basis of Table 18 in that Topic Paper, we assume that this figure is calculated on the assumption that all extant permissions, existing site allocations, windfall sites and new allocations deliver as expected in the trajectory.

The ‘Housing Supply and Trajectory’ Topic Paper indicates that the 4,000 dwellings at Paddock Wood/Capel are expected to be delivered from 2024/2025 and at a consistent rate of between 333/334 dwellings per annum until 2036. We consider that the Council has been overly optimistic over the lead in time before this scheme is delivered and then the subsequent rate of housing completions for the reasons set out below:
• Lead in: the ‘Housing Supply and Trajectory’ envisages that development would commence on this site in 2024/2025. We understand that the Council’s Local Development Scheme envisages that the new Local Plan will be adopted in Autumn 2021. That means that there would be less than 4 years between the adoption of the Local Plan and the delivery of housing at this site. However Policy STR/PW 1 establishes that there is a significant amount of work to be undertaken in relation to this allocation. That work includes comprehensive masterplanning and the creation and adoption of one or more Supplementary Planning Documents. The Policy indicates that compulsory purchase powers may be utilised to ensure comprehensive development.

The Lichfield report ‘From Start to Finish’ identifies average ‘lead in times’ of close to 7 years for sites larger than 2,000 dwellings. The LPA’s assumptions are that the site delivers less than 4 years from when they expect the Local Plan to be adopted. This lead in time is extremely optimistic and fails to reflect the complexities of delivering large scale strategic residential sites including land assembly, the preparation of SPDs, the preparation and determination of (complex) applications, reserved matters, conditions and infrastructure delivery. In opinion, the lead in time should therefore be extended. If the delivery of housing from the Paddock Wood/Capel allocation were delayed until 7 full years after the adoption of the Plan, that would suggest the first dwellings would be completed in 2027/28, three years later than expected by the Council. The effect of this would be to remove 1,000 dwellings from the supply. Removing 1,000 from the housing trajectory would decrease supply to 13,776, representing a buffer of 256 against the overall housing requirement.

• Completions rate: the Topic Paper seeks to justify the rate of delivery on the basis of the Letwin Review’s conclusions regarding sites with 8 or more developers). The Topic Paper (paragraph 5.5.14) explains that the Council does not know how many housebuilders would be involved in delivering this allocation (although it notes a “high possibility” that there would be 8 or more). In our opinion, the evidence to support the Council’s conclusions that 33/334 dwellings would be delivered every year has not been provided. Furthermore, there is no analysis as to how matters such as the requirement for phasing/infrastructure delivery would affect the completions rate. The Council appear to also rely on the prospect that developers may provide land to others, however there is no evidence to support that claim. Where large sites such as this are proposed for allocation, there is usually a recognition that delivery rates increase over time (rather than maintaining a continuous and consistent level). In any event, we consider that the expected completions rate is likely to be excessive, particularly due to the uncertainty over the number of developers involved. Even in the event that this site did begin delivering in 2024/2025, then a more reasonable assumption over completions rates (say an average of 250 dpa) would indicate that around 3,000 dwellings would be delivered by 2036 (however this fails to have regard to the need to extend the lead in time as explained elsewhere). Removing 1,000 from the housing trajectory would decrease supply to 13,776, representing a buffer of 256 against the overall housing requirement.

The fact that there is such uncertainty regarding the deliverability and timescales for the strategic scale development envisaged at Paddock Wood/Capel is of significance since 4,000 dwellings represents more than a quarter (27.08%) of the total expected supply to 2036. Our comments in relation to the lead in time and average completion rates both result in 1,000 dwellings being removed from the supply in their own right (i.e. without regard to wider considerations). Combining these two considerations (applying a more reasonable assumption to delivery rates, with commencement in 2027/28 at the earliest, and a more reasonable approach of 250 dwellings per annum) would result in 2,250 dwellings (1,750 fewer than the Council envisages) delivered from this allocation by 2036. This could have very severe consequences for the achievement of the housing requirement overall. Removing 1,750 dwellings from the Paddock Wood/Capel allocation by 2036 would result in 13,026 dwellings being delivered in that period (assuming all other allocations and sources of supply deliver as expected). This would represent a shortfall of 534 dwellings against the overall planned housing requirements.
The ‘Housing Supply and Trajectory’ Topic Paper indicates that 1,900 dwellings at Tudeley Village are expected to be delivered from 2025/2026 and at a rate of between 150 – 200 dwellings per annum until 2036. We consider that the Council has been overly optimistic over the lead in time before this scheme is delivered and then the subsequent rate of housing completions for the reasons set out below:

- **Lead in:** the ‘Housing Supply and Trajectory’ envisages that development would commence on this site in 2025/2026. We understand that the Council’s Local Development Scheme envisages that the new Local Plan will be adopted in Autumn 2021. That means that there would be less than 4 years between the adoption of the Local Plan and the delivery of housing at this site. However Policy STR/CA 1 establishes that there is a significant amount of work to be undertaken in relation to this allocation. That work includes comprehensive masterplanning and the creation and adoption of one or more Supplementary Planning Documents. The Policy indicates that compulsory purchase powers may be utilised to ensure comprehensive development.

The Lichfield report ‘From Start to Finish’ identifies average ‘lead in times’ of close to 7 years for sites larger than 2,000 dwellings. The LPA’s assumptions are that the site delivers less than 5 years from when they expect the Local Plan to be adopted. This lead in time is extremely optimistic and fails to reflect the complexities of delivering large scale strategic residential sites including land assembly, the preparation of SPDs, the preparation and determination of (complex) applications, reserved matters, conditions and infrastructure delivery. In opinion, the lead in time should therefore be extended. If the delivery of housing from the Tudeley Village allocation were delayed until 7 full years after the adoption of the Plan, that would suggest the first dwellings would be completed in 2027/28, two years later than expected by the Council. The effect of this would be to remove 300 dwellings from the supply.

- **Completions rate:** Whilst the Council appears to have applied more reasonable completion rates to this site, we consider that evidence will still need to be provided in order to support the claimed figures. Given the overall contribution that this site makes towards housing supply to 2036, it is imperative that the Local Plan is based upon a justified housing trajectory.

In isolation the alterations referred to above to Tudeley Village scheme may not result in housing delivery falling below the overall requirements, assuming that it does indeed come forward and at the rate envisaged by the Council. More significant alterations to those referred to above could have dramatic consequences on the achievement of the overall housing requirement (irrespective of any other alterations made to supply).

In combination the reduction in supply from Paddock Wood/Capel (1,750 dwellings) and Tudeley Village (300 dwellings) would remove 2,050 dwellings from the overall housing trajectory and lead to a shortfall of 800 dwellings against the planned housing requirement of 13,560 dwellings (without any other alterations and without any consideration being given to the suitability/sustainability of these allocations).

These comments demonstrate that, without evidence to support the claimed lead in times or completion rates, the Council is overly reliant upon two sites to achieve the planned housing requirement to 2036. Additional flexibility and sources of supply are therefore required. Revising the current housing trajectory to reflect fairly modest amendments (delaying Paddock Wood/Capel by three years and Tudeley Village by two years and more realistic delivery rates) alone results in a significant undersupply of housing against the capped figure derived from the standard method. Other alterations, such reductions in the windfall allowance or reductions in the supply from other allocations/commitments would increase the extent of that shortfall.

As currently prepared, the Local Plan does not represent a vehicle by which the planned housing requirements will be achieved. In contrast, the Plan will result in an undersupply of housing. This is likely to have severe consequences for the Council’s ability to demonstrate a rolling five year supply of deliverable housing sites. This is compounded by the reliance on two large sites (1,900 at Tudeley Village and 4,000 at Paddock Wood delivering
5,900 in combination) represents 77% of the remaining level of housing expected during the Plan period (7,593 dwellings).

Accordingly, we consider that it is essential that the Council allocate a greater range and diversity of sites for residential development to ensure that the housing requirement of the Plan can be achieved.

Bellway reserve the opportunity to comment on the Council’s housing trajectory, including the other sites proposed for residential allocation, in more detail as the Local Plan progresses.

**Meeting Affordable Housing Needs**

The Housing Needs Assessment Topic Paper (paragraph 45) explains that:

"The Council’s SHMA, 2015 found that the borough would need 341 affordable homes per annum to meet their housing needs and be eligible for affordable housing."

The Housing Needs Assessment Topic Paper (paragraph 47) explains that:

"A separate Housing Need Study, in 2018, assessed affordable requirements by taking into account the need from existing and newly forming households within sub areas of the borough of Tunbridge Wells, and comparing this with the supply of affordable housing. Against a gross need for affordable housing of 662 dwellings each year, when the likely annual affordable supply is taken into account, the overall net imbalance is 443 affordable dwellings each year."

Paragraph 48 of the Topic Paper concludes that:

"The corrected affordable housing need over a 15 year period, based on the HNS estimate, is actually 391 dwellings/year."

Over a fifteen year period from 2021 – 2036, an affordable housing need of 391 dwellings per annum would equate to 5,865 dwellings.

Policy H5 of the draft Local Plan expects all greenfield sites over more than 9 dwellings to deliver a minimum of 40% affordable housing. For the sake of ease, if 40% of all 7,593 dwellings required to achieve the overall housing requirement (13,560) were delivered as affordable housing, that would provide 3,037 affordable dwellings (significantly fewer than need acknowledged by the Council). However that approach misrepresents the supply of affordable housing bearing in mind the different requirements applied by Policy H5.

In addition to the comments set out above, we note that the draft Plan does not establish the level of affordable housing to be delivered from the Paddock Wood/Tudeley Village allocations, with this left to a later stage (Regulation 19 of the Local Plan being prepared) and based on the Local Plan and CIL Stage 2 Viability Assessment. These two sites (alone and in combination) represent by far the greatest sources of housing supply envisaged in the Borough to 2036 and as such the Local Plan should clarify the quantum of affordable housing that they are expected to provide. Without such information conclusions cannot be reached about the extent to which the Local Plan will meet affordable housing needs.

On the basis of these comments alone, we consider that the Local Plan falls to represent a positive approach to addressing the need for affordable housing in the Borough. It should also be noted that the provision of affordable housing to 2036 would also be reduced in the event that the strategic allocations at Paddock Wood/Capel or Tureley are delayed, do not achieve the delivery rates envisaged by the Council or if the further work in support of the Local Plan/CIL indicates that the sites themselves should provide fewer affordable dwellings than might otherwise be expected.
Policy STR1: The Development Strategy
Policy STR1 is accompanied by Table 1 of the draft Local Plan which sets out the scale and distribution of development. That table identifies Tunbridge Wells as the Main Urban Area where allocations are expected to deliver 1,222-1,320 dwellings (average 1,271). Notably Tunbridge Wells is expected to accommodate significantly fewer dwellings than Tudeley Village during the Plan period despite the clear and obvious disparity between the two settlements/areas. Fundamentally, Tunbridge Wells is a sustainable location for growth now, Tudeley Village is not and will never be in a position where it exhibits the same overall sustainability credentials as Tunbridge Wells.

Overall we note that the quantum of development directed to Tunbridge Wells is disproportionately low compared to the levels of development expected to be provided at other, less sustainable, settlements within the Borough. This is despite the availability of sites at Tunbridge Wells which have been assessed as being suitable, sustainable and logical.

Whilst we note that the consultation is accompanied by a Topic Paper on the ‘Distribution of Development’, this appears to be an explanation as to why sites have been selected, rather than an explanation why other approaches, such as a wider distribution of development without reliance on a garden settlement, or a refocus towards Tunbridge Wells have been excluded.

In addition, we consider that the Policy should define the ‘identified needs of the borough over the Local Plan period’. This is set out in the preceding paragraphs, but not in the policy itself.

Policy STR/RTW 1: The Strategy for Royal Tunbridge Wells
We have set out comments elsewhere regarding the disproportionately low levels of development directed to Tunbridge Wells in comparison to other settlements.

Point 6 of the draft policy refers to “A new sports hub at Hawkenbury Recreation Ground, to include standing/seating for supporters and other ancillary structures.” This scheme is also referred to elsewhere in the policy as point c under the heading ‘Contributions Required’. We understand this refers to the development expected under Policy AL/RTW 23 which, as these representations sets out, should be considered undeliverable with the Council’s own evidence suggesting that this area would be a suitable, sustainable and logical site for housing/economic development (in the SHELAA). These references should therefore be removed from Policy STR/RTW 1.

Policies AL/CA 3 and AL/PW 1 and Policy STR/PW 1: The Strategy for Paddock Wood
The draft Local Plan proposes approximately 4,000 dwellings at Paddock Wood (in Paddock Wood and Capel parishes). We have set out comments on the deliverability of this site elsewhere in these representations and reserve the opportunity to comment in greater detail if this site is retained in subsequent versions of the Local Plan.

We note that this site is acknowledged to be subject to a number of specific constraints, including land being within Flood Zone 3. This Local Plan consultation does not appear to be supported by any material which explores or demonstrates how the quantum of development (residential and other uses) and associated infrastructure can be accommodated within the site.

Policy AL/CA 3 relates to Land at Capel and Paddock Wood and the land shown on Map 39. Policy AL/PW 1 relates to the Land at Capel and Paddock Wood as shown on Map 40. In addition, we note that Policy STR/PW 1 sets out the strategy for Paddock Wood. In our opinion, this combination of policies is highly confusing. Whilst we understand that it may be useful to have a policy relating to the strategy for the wider Paddock Wood area, there does not appear to be any sense in having two policies relating to the strategic scale development envisaged around Paddock Wood.
Policy AL/CA 1: Tudeley Village

The draft Local Plan proposes a standalone garden settlement (referred to as Tudeley Village) of up to 2,500 – 2,700 dwellings (1,900 of which are expected by the Council to be delivered in the Plan period). We have set out comments on the deliverability of this site elsewhere in these representations and reserve the opportunity to comment in greater detail if this site is retained in subsequent versions of the Local Plan.

This development is to be focused on the very small settlement of Tudeley. It is clear that the existing settlement comprises a small number of dwellings with very limited facilities. This view is reinforced by the overview on pages 154 – 156 of the draft Local Plan. Although the railway line runs between the site of the proposed garden settlement, Tudeley is not served by a railway station and the nearest stations are at Tonbridge (approximately 4km to the west or Paddock Wood (approximately 7.4km to the east).

The Policy does not include any requirements for the garden settlement to provide a new railway station. Policy AL/CA 1 seeks to ensure that the scheme includes:

“Integrated, forward looking and accessible transport options that support economic prosperity and wellbeing for residents. This should include promotion of public transport, walking, and cycling so that settlements are easy to navigate, and facilitate simple and sustainable access to jobs, education, and services.”

“Transport provision shall be delivered on a strategic basis, taking account of the impact of proposed development at land at Capel and Paddock Wood, with transport infrastructure links between Paddock Wood, Tudeley Village, Tonbridge, and Royal Tunbridge Wells. A key element will be determining the most appropriate route to link to the road network to the east, which shall minimise the impact on the existing highway network through Five Oak Green, and should seek to reduce traffic levels through this settlement, and have regard to Kent County Council minerals allocations in the vicinity and sensitive receptors such as Capel Primary School. Contributions will be required towards the provision of the potential offline A228 strategic link and eastward link to the A228 or land at Capel and Paddock Wood”

On the basis of this policy context and the description of Tudeley on pages 154 – 156, our interpretation is that the area would, in normal circumstances, be considered to be a wholly unsustainable location for the scale of growth envisaged in the emerging Local Plan. There are very little facilities or employment opportunities in the area and the existing public transport opportunities are limited. The Council’s approach appears to be that the garden settlement itself may deliver employment uses and facilities and that links to other settlements will be provided.

Bellway contend that the steps required to make Tudeley Village a sustainable location for the scale of growth envisaged are significant. The Council cannot have certainty that employment uses will be forthcoming in a manner which reflects housing delivery or that those uses will be sustained in this inaccessible area over the longer term. Whilst the Council seeks to ensure that the allocation supports the use of public transport opportunities to other settlements, it is highly likely that the garden settlement itself will continue to generate a significant level of trips by car to other locations.

It is clear that there are other, alternative options (such as the land at Mouseden Farm) which are capable of providing new homes in areas which are closer to a range of existing services and facilities which can be enhanced and can facilitate access via public transport, walking and cycling.

Bellway consider that Tudeley Village will support the delivery of a strategic scale development which is fundamentally in the wrong place.

In addition to the specific points set out above, Bellway consider that there is no clear explanation within the Council’s evidence base to explain why the Tudeley Village option has been selected and other options discounted. The area in which Tudeley Village is located in the Green Belt, as is the site promoted by Bellway at Mouseden
Farm, however in the case of Tudeley Village, this does not support sustainable patterns of development and does not build upon existing facilities whereas the delivery of additional recreation at High Woods Lane would. Indeed the Council have acknowledged this as a solution by securing planning permission but cannot deliver it, so why a residential allocation to facilitate such needed recreational facilities is not being supported by the Council is a mystery.

We note that the SHELAA assessment of Tudeley Village (site 448) appears to be based upon assumptions about what services and facilities the development could provide. For example the SHELAA states “The Services and Facilities objective scores positively reflecting the likely well thought-out provision in the new settlement as a result of the master planning process. The settlement also benefits from the proximity of enhanced provision at the nearby North Farm retail park, Tonbridge and Royal Tunbridge Wells.”. The SHELAA also refers to “A positive score for travel is applied following a similar logic to air quality whilst also considering new bus routes and relatively easy access to train stations.

However, as we establish above, Tudeley is not served by a railway station and the nearest stations are at Tonbridge (approximately 4km to the west or Paddock Wood (approximately 7.4km to the east).

Whilst the SHELAA analysis of site 448 found the site “is considered suitable as a potential Local Plan allocation subject to further consideration”, it also found that “The site is in the Green Belt: the TWB Green Belt study (2017) identified that the harm caused by the release of land in this broad parcel is ‘high’.”

Bellway consider that the Council’s proposed allocation of a garden settlement at Tudeley Village is fundamentally unsound. The location of this site is remote and it does not benefit from a railway station. Although there are stations in the area, these are some distance away and the garden settlement appears to be predicated on the basis that a movement strategy will be implemented to access these. That primarily relies on new road links.

Policy AL/RTW 23: Land to the north of Hawkenbury Recreation Ground (SHELAA reference: part of Site 53)

This proposed allocation relates to the southern part of the land promoted by Bellway. As the draft Local Plan acknowledges, this area does benefit from planning permission granted in 2017 for recreational facilities. No submissions have been made to discharge the conditions of that permission. Moreover, the land is subject to an option in favour of Bellway for a number of years. The fact that this site and land to the north is subject to an agreement with a national housebuilder (who is promoting the site for residential development and recreation use) is clear indication that the allocation of this site for solely recreational purposes (as envisaged in Policy AL/RTW 23) is undeliverable without being facilitated through a comprehensive site development policy including an element of housing to the north.

In addition, as we explain elsewhere, the Council’s own evidence, namely that undertaken by LUC overstates the contribution (and therefore harm) that releasing the are proposed for recreational purposes under allocation AL/RTW 23 makes to the Green Belt. This area forms part of parcel TW6a. The contribution of Parcel TW6a as a whole has been overstated, however as the Turley Outline Landscape, Visual and Green Belt Advice Note demonstrates, the southern part of the land promoted by Bellway makes a lesser contribution in its own right.

Furthermore, we refer to the SHELAA analysis of site 53 which found that it was (in part) a suitable, sustainable and logical site for development. Those specific references were to the southern part of the site promoted by Bellway and so relate to the area proposed for designation under Policy AL/RTW 23. Those conclusions were made in a document which considers the suitability of sites for housing and economic purposes and so must be read as relating to such forms of development, rather than recreational uses.
Although the Council has published a number of documents in support of the draft Local Plan in relation to open space and sports facilities, as far as we can establish, none of those refer to the necessity or appropriateness of allocating the site AL/RTW 23 for recreational purposes.

It appears as though this site is proposed for allocation simply because of a planning permission granted in 2017 yet no thought has been given as to how it will actually be delivered. In contrast the Council’s own evidence (in the SHELAA) refers to its suitability, sustainability and logic for housing/economic purposes.

The allocation under Policy AL/RTW 23 is therefore fundamentally unsound and undeliverable.

Bellway is capable of facilitating the delivery of the sports pitches within the wider site promoted via these representation in conjunction with residential development at the site. Bellway would be willing to enter into dialogue with the Council as to how this site could be delivered whilst providing the sports pitches. Bellway would be willing to then transfer the recreation and sports facilities to the Borough Council.

As these representations advocate, the emerging Local Plan should be revised to include a policy which seeks to facilitate the recreation and sports facilities at this site, provided in conjunction with and facilitated by, residential development at the wider site. Bellway would be willing to engage with the LPA regarding the wording of any such policy.

**Comments on Other Documents**

**Sustainability Appraisal**

Whilst the Sustainability Appraisal appears to consider the options for a Garden Settlement, we have been unable to locate any assessment at this stage which does not include such an option as part of the distribution strategy. In our view, it would be a reasonable alternative to consider a solution which does not include a Garden Village. In particular we consider that this is essential due to the fact that the Tudeley Village site is remote, does not benefit from access to rail services, is not related to existing services/facilities and significant intervention will be required to provide any facilities in the area. In contrast, alternative sites would provide opportunities to locate development in areas which already relate to existing settlements and services.

We note that Table 20 of the Sustainability Appraisal sets out a list of reasonable alternative sites in Royal Tunbridge Wells. Site reference 53 (being the land promoted by Bellway) is referred to in that list of sites. Table 20 confirms part of the site is proposed to be allocated under AL/RTW 23.

The scoring of site 53 against the SA objectives is contained on page 164 of the Sustainability Appraisal. The SA does not appear to include any detailed explanation as to how the scores have been calculated and so it is not possible for respondents and stakeholders to analyse the impacts of one site over another.

**Proposals Map**

The Proposals Map published for consultation is of extremely low resolution and does not allow a clear understanding of the policies applicable to any specific area. We consider that it is essential, in order to understand how the Local Plan is to be applied, that a higher resolution version of the Proposals Map is made available.

**Green Belt Assessment**

In the LUC Green Belt Strategic Study of November 2016, the southern part of the site is located in Parcel TW6 and the remainder in Broad Ave BA7, as shown below:
Parcel TW6 is identified as an area for further assessment, with Table 6.2 of the 2016 document identifying ‘Potential Stage Two parcels and broad areas’. In relation to TW6, Table 6.2 identifies the ‘Key Stage 2 Considerations’ as being the “Relationship between settlement and countryside, with reference to role of High Wood in forming barrier to encroachment/sprawl.”

The Key Stage 2 Considerations for Parcel BA6 are referred to as being “Contribution to preventing countryside encroachment and role in historic setting of Tunbridge Wells”.

As an initial comment, Bellway note that the assessment of BA6 cannot be relied upon as an indication that all the land within the Broad Area fulfills Green Belt purposes to the same extent. For example, while the 2016 document may have concluded that BA6 makes a contribution to preventing countryside encroachment and plays a role in the historic setting of Tunbridge Wells, that is not to say that the land promoted by Bellway to the north of High Woods Lane performs these functions.

The LUC Tunbridge Wells Green Belt Study Stage Two report was published in July 2017. In relation to the Broad Areas, this report found that “All 10 broad areas were considered to rate very high for harm to Green Belt resulting from release of land for strategic development. It should however that there might be opportunities for small-scale – i.e. non-strategic – development that would result in less harm to Green Belt purposes.” This overall conclusion accords with Bellway’s own interpretation as articulated in the previous paragraph of these representations.

Table 1.1 of the July 2017 LUC report identifies all of the specific parcels with moderate or lower harm rating. Only seven specific parcels are found to have a low or very low level of harm on the Green Belt. Parcel TW6 was split in two for the purposes of this assessment: TW6a (including the southern part of the land promoted by Bellway) and TW6b. TW6a is identified as having a ‘moderate’ level of harm on the Green Belt. However we note that Table 6.1 of the July 2017 report found that Parcel TW6a would have: makes a moderate contribution to GB purpose 1; makes a weak or no contribution to purpose 2; makes a moderate contribution to GB purpose 3; and makes a moderate contribution to GB purpose 4.

Appendix A of the 2017 report considered the Broad Areas. However it does not appear as though there was any analysis over the contribution that smaller parts of the Broad Areas makes to the Green Belt purposes and therefore no analysis as to the extent to which these could accommodate development. This approach appears at odds with the conclusions elsewhere in the 2017 report that “there might be opportunities for small-scale
- i.e. non-strategic – development that would result in less harm to Green Belt purposes.” The Turley Outline Landscape, Visual and Green Belt Advice Note considers the contribution that the northern part of the site promoted by Bellway (which falls within BA6) makes to the Green Belt purposes as follows:

- Whereas LUC conclude that BA6 makes a strong contribution to GB purpose 1, the Turley Outline Landscape, Visual and Green Belt Advice Note demonstrates that the land northern part of the land promoted by Bellway (within BA6) should only be considered to make a moderate contribution.

- In relation to GB purpose 2, LUC conclude that BA6 makes a strong contribution. The Turley Outline Landscape, Visual and Green Belt Advice Note demonstrates the edge of Pembury is over 2km away from the Appraisal Site and on account of intervening topography and woodland has no perceivable relationship with this settlement area. Development of the northern parcel of the Site would result in little or no perception of the narrowing of the gap between towns and it is therefore considered to make ‘Weak/No’ contribution to Purpose 2.

- LUC conclude that BA6 makes a strong contribution GB purpose 3. The Turley Outline Landscape, Visual and Green Belt Advice Note demonstrates that due to the relationship of the northern part of the area promoted by Bellway to the wider countryside it is considered to make a ‘Moderate’ contribution to Purpose 3.

- LUC conclude that BA6 makes a strong contribution to purpose 4. The Turley Outline Landscape, Visual and Green Belt Advice Note explains that the contribution to this purpose is made most strongly by Dunorlan Park which is a key feature on the edge of the historic town. However, the parcel does form part of the setting to the edge of both the Tunbridge Wells Conservation Area and Dunorlan Park and is glimpsed in some key views from the latter. For this reason it is considered to make a ‘Moderate’ contribution to Purpose 4.

On the basis of the Turley Outline Landscape, Visual and Green Belt Advice Note, it is considered that the July 2017 LUC report overstates the contribution that the part of Broad Area BA6 promoted by Bellway has been overstated. When this part of BA6 is considered independently, it makes a moderate contribution to Green Belt purposes.

Appendix A of the 2017 report also provided an analysis of the specific parcels against the Green Belt purposes. Bellway consider that the assessment in relation to Parcel TW6a is flawed. The table below sets out the assessment of this parcel in the LUC 2017 report and provides our response and reason why the conclusions are flawed:

<table>
<thead>
<tr>
<th>Green Belt Purpose 1</th>
<th>LUC Conclusion</th>
<th>Bellway’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Check the unrestricted sprawl of large built-up areas</td>
<td>The parcel is adjacent to the large built-up area but has a degree of separation from both the settlement and the wider countryside. The western part of the recreation ground has a stronger relationship with the urban area, but is too small to be assessed as a separate strategic parcel. Moderate impact</td>
<td>Bellway disagree that the parcel has a degree of separation from the settlement. The western boundary is contiguous with the edge of the settlement and there is no existing vegetation which results in separation as suggested by LUC. The enclosed Outline Landscape, Visual and Green Belt Advice Note prepared by Turley demonstrates that when the site promoted by Bellway is considered independently, it is considered to contribute less to Purpose 1 than the Parcel TW6a.</td>
</tr>
</tbody>
</table>
This is due to the direct association with the settlement edge to the west and the formal recreation ground to the south. The presence of High Wood and the indoor bowls centre also increases the separation from the wider countryside.

The Turley Outline Landscape, Visual and Green Belt Advice Note explains that this area makes a ‘Relatively Weak’ contribution to Purpose 1.

<table>
<thead>
<tr>
<th>Purpose</th>
<th>LUC Conclusion</th>
<th>Bellway’s Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prevent neighbouring towns merging into one another</td>
<td>Development of this parcel would result in little or no perception of the narrowing of the gap between towns. Weak or no contribution</td>
<td>The next settlement/town to the east is some distance from Parcel TW6a and Bellway consider that the development of this area would not result in neighbouring towns from merging in actual or perceived terms. On that basis, the LUC conclusion of ‘weak or no contribution’ overstates the role of the parcel. The correct conclusion would be ‘no contribution’.</td>
</tr>
<tr>
<td>Assist in safeguarding the countryside from encroachment</td>
<td>The parcel has a degree of separation from both the settlement and the wider countryside. The western part of the recreation ground has a stronger relationship with the urban area, but is too small to be assessed as a separate strategic parcel. Moderate contribution</td>
<td>The Turley Outline Landscape, Visual and Green Belt Advice Note explains that the site promoted by Bellway in parcel A relatively self-contained unit that is influenced by the overlooking residential development on the settlement edge. It is also relatively contained from the wider countryside on account of the enclosure formed by topography and High Wood. It is therefore considered that the southern parcel makes a ‘Relatively Weak’ contribution to Purpose 3.</td>
</tr>
<tr>
<td>To preserve the special character of historic towns</td>
<td>The arable field in the northern part of the parcel is an element in views from Dunoran Park (a Registered Park and Garden) of the open</td>
<td>The Turley Outline Landscape, Visual and Green Belt Advice Note concurs with this assessment.</td>
</tr>
</tbody>
</table>
ridgeline forming the foreground to High Wood. The openness of this high ground contributes to the town’s historic character, but development contained to the west of High Wood would have a limited impact on this. The western part of the recreation ground has a stronger relationship with the urban area.

The Turley Outline Landscape, Visual and Green Belt Advice Note demonstrates that the contribution of Parcel TW6a has been overstated, particularly when the land promoted by Bellway is considered independent.

On the basis of the summary set out above, and supported by the Turley Outline Landscape, Visual and Green Belt Advice Note, it is clear that the LUC reports which have informed the Local Plan in relation to the land currently designated as Green Belt have overstated the role and function of the land promoted by Bellway.

Bellway therefore consider that it is essential that the Council undertakes an updated and more robust analysis of the extent to which particular areas (including the land promoted by Bellway) contribute to the Green Belt purposes. Without this updated evidence, Bellway contend that the Council cannot have certainty that the distribution strategy which it has chosen (including the Tudeley Village concept) is justified and that alternative options should not have been pursued.

**Strategic Housing and Economic Land Availability Assessment (SHELAA)**

In the July 2019 SHELAA the land promoted by Bellway is considered under site reference S3. The assessment found that the “Site is suitable in part as a potential Local Plan allocation subject to further consideration”. The reason for this conclusion was stated as being “The southern parcel of this site lies adjacent to the LBD and is likely to be sustainable in this context. This would form a logical extension to LBD. The remaining area, the first parcel whilst in proximity to the LBD would not form a logical extension to the LBD and is considered to adversely affect the landscape setting of the town and is part of a Green Belt parcel the release of which is considered to result in very high harm, and setting of an Historic Park and Garden.”

The SHELAA conclusion was that the southern part of the site promoted by Bellway (i.e. the land south of High Woods Lane) would be a **logical extension to the LBD**.

It is essential to note that the SHELAA is an assessment of sites for housing and economic land purposes and so the conclusions of that document must be read in that regard. The analysis of site S3 and the conclusions in relation to the suitability, sustainability and logic of the site must therefore refer to housing or economic land uses. There is no suggestion in the SHELAA that the conclusions in relation to site S3 relate to any other form of land use or that they would not apply in relation to housing or economic uses.

**SUMMARY**

These representations set out **significant concerns** regarding the draft Local Plan for Tunbridge Wells Borough. In summary, the level of housing required to address issues of affordability and does not provide any realistic opportunities to make a meaningful contribution to meeting affordable housing needs. Whilst the Council claims that the housing supply represents a buffer over the planned requirement, this is based on extremely optimistic assumptions and short lead in times before the key sites deliver. In the case of Paddock Wood the Plan then relies upon very high delivery rates.

A more diverse and greater range of sites are required to address affordability, provide affordable housing and to help ensure that the housing requirement is achievable.
The Plan also provides a disproportionately low level of new housing at Tunbridge Wells despite the sustainability of this settlement, in comparison to other, less sustainable locations. This is borne out by the selection of the Tudeley Village site as a location for a new garden village in a remote location. Alternative options are available which would direct development to the most sustainable settlement (i.e. Tunbridge Wells) and which are in sustainable locations.

This conclusion is supported by the Council’s own evidence which demonstrates the availability and suitability, sustainability and logic of alternative sites on the edge of Tunbridge Wells (including the land promoted by Bellway which is subject to these representations).

The Council’s own evidence has overstated the contribution that certain sites, including the land promoted by Bellway which is subject to these representations) makes to the Green Belt. When the land is assessed in a more robust manner (and when assessed independently rather than as part of wider Broad Areas), the contribution is significantly reduced.

The southern part of the land promoted by Bellway (i.e. the land south of High Woods Lane) is subject to a planning permission for recreational uses. That application was submitted by the Borough Council, however the Council has no interest in the land and has not taken any steps to discharge pre-commencement conditions. In contrast, Bellway has a legal interest in the land and is promoting this area, as part of a wider site, for residential development. Bellway would be willing to work with the Borough Council to explore opportunities for bringing forward the approved recreational facilities in the area, which residential development on the site could help deliver.

As it is currently drafted the Local Plan is unsound. These fundamental issues of unsoundness are compounded by a lack of documentary evidence to explain why the Council has selected the approaches and proposed allocations in the emerging Local Plan.

Bellway would be willing to enter into dialogue regarding the land north and south of High Wood Lane and the extent to which this site could deliver housing (delivering the greater range and diversity of sites) in a sustainable location. Bellway would be willing to discuss the manner in which such housing could assist in delivering additional recreational facilities in the area.

Yours sincerely

David Murray-Cox
Associate Director
Appendix 1: Outline Landscape, Visual and Green Belt Advice Note
Outline Landscape, Visual and Green Belt Advice Note

Land at Mouseden Farm, High Woods Lane, Royal Tunbridge Wells

June 2018

Introduction

1. This Outline Landscape, Visual and Green Belt Appraisal (LVA) for land at Mouseden Farm, Royal Tunbridge Wells has been prepared by Turley Landscape and VIA on behalf of Bellway Homes Ltd. Its purpose is to identify the existing landscape character context, visual context and Green Belt context of the site and identify the key landscape related opportunities and constraints of the site. The report is supported by a Landscape and Visual Opportunities and Constraints plan (Figure 1) and a Framework Masterplan (Drawing 3002).

2. The site is predominantly located within the High Weald AONB and also within the Green Belt which are recognised constraints to development. However, due to much of the landscape surrounding Royal Tunbridge Wells being covered by designations and the need to meet housing provision, further consideration of more sensitive sites should be provided. This should be supported by design principles that look to conserve and enhance the special qualities of the landscape.

3. The site comprises four areas of agricultural fields located to the southeast of Royal Tunbridge Wells. For the purpose of this appraisal, the site as a whole is referred to as the ‘Appraisal Site’ and the four areas within the site are referred to as Fields A – D (as identified on the landscape opportunities and constraints plan). High Woods Lane splits the Appraisal Site in two with Field A located to the south of it and Fields B, C and D to the north. Field A bounded to the west by properties along Cleeve Avenue and properties along Sherborne Close, to the south by Hawkenbury Recreation Ground and to the east by High Wood. The Hawkenbury Allotments bound Field B to the west and Hall’s Hole Road forms the western boundary to Field D. The northern boundary of Fields C and D, and part of the eastern boundary to Fields B and C are not formed of a permanent boundary and these fields are part of larger fields.

Surveys

4. A preliminary desk study was undertaken to establish the physical components of the Appraisal Site and its surroundings along with potential visual receptors. Ordnance Survey (OS) maps and aerial photography were utilised to identify these features. A field study was undertaken by a chartered landscape architect from Turley Landscape and VIA on 30th May 2018, during which the visibility was moderate. Features of the Appraisal Site and the surrounding area were identified and verified along with the visual receptors previously established. The field study also involved travelling through the study area and producing a working photographic record of key views and features within the area.
Designations

5. The Appraisal Site is located within the High Weald AONB with the exception of Field D. This designation encloses the settlement edge of Royal Tunbridge Wells. Other designations in the vicinity of the Appraisal Site include:

- Tunbridge Wells Conservation Area: Area 8 Pembury Road – located to the western side of Hall’s Hole Road and including part of Dunorlan Park and a narrow ridge above it. Views across the landscape to the southeast (including the Appraisal Site) are best experienced from elevated parts of Dunorlan Park.

- Dunorlan Park - grade II listed park and garden of special historic interest located adjacent to Field D to the western side of Hall’s Hole Road. The park is publically accessible with parking, café, boating lake, ornamental gardens and formal walking routes.

- High Wood – a Local Wildlife Site and area of Ancient Woodland which encloses part of the eastern boundary to Fields A and B. It is located at the top of a ridge to the south of the town and is a prominent feature in the landscape.

- 35 Forest Road – grade II listed two storey mid-19th Century house is part of the Abergavenny estate, located c.280m to the west of the Field A.

- Features within Dunorlan Park including the pulhamite and terracotta fountain; pulhamite cascade, stepping stones and bridge in the water garden; pulhamite rockery; terrace wall and steps to the southeast of Dunorlan House; and, the Grecian Temple – all of which are grade II listed and located to the northwest of the Appraisal Site.

6. The Appraisal Site was previously located within the Kent Special Landscape Area (Policy EN27 of the 2006 local plan). This policy has now been superseded by Core Strategy Policy CP4. This follows a trend in the removal of Local Landscape Designations in favour of a landscape character based approach to evaluating landscapes together with the requirement to conserve and enhance the locally distinctive sense of place and character of the Borough’s built and natural environments as a whole.

Guidance for development in the AONB


7. The management plan has been produced in order to focus on delivering the statutory purpose of the AONB designation: conserving and enhancing natural beauty. It also sets out a framework to help the relevant local authorities make planning decisions. The High Weald AONB is an area of ancient countryside comprising a mosaic of small farms, fields and woodland. The management plan identifies five key components of character that combine in a distinctive pattern and form the fabric of the landscape that is experienced today. These components are:

- geology and water systems (sandstone outcrops and ghyll streams);
- settlements (dispersed settlement pattern and historic farmsteads);
- routeways (droveways and sunken lanes);
- woodland (ancient woodland and archaeological remains); and,
- field and heathland (unimproved grassland (meadows), heathland and historic fields systems)
8. Objectives for each of the five components are identified in the management plan. The following objectives are considered relevant to the Appraisal Site and potential development within it. These are supported by more detailed indicators of success and targets for 2019 which have been considered in the determination of landscape and visual opportunities and constraints later in this note.

- **S1 Objective:** To reconnect settlements, residents and their supporting economic activity with the surrounding countryside.
- **S3 Objective:** To enhance the architectural quality of the High Weald.
- **R1 Objective:** To maintain the historic pattern and features of routeways.
- **R2 Objective:** To enhance the ecological function of routeways.
- **W1 Objective:** To maintain existing extent of woodland and particularly ancient woodland.
- **W2 Objective:** To enhance the ecological functioning of woodland at a landscape scale.
- **FH2 Objective:** To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.
- **FH3 Objective:** To enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.

**High Weald AONB: Guidance on the selection and use of colour in development**

9. This document was produced in 2017 and recognises that generic and poor design for housing and commercial development within the AONB is one of the major threats to its distinctiveness and the urbanisation of the countryside. This can be contributed to by poor choices of colour.

10. The purpose of the document is to provide direction and guidance on the selection and use of colour in development that takes place within the High Weald AONB. It is based on the principle that colour is never seen in isolation from its setting and colours for building materials must take account of their context. The document has identified colour palettes for the existing landscape and colours that would be appropriate for development within these areas of landscape.

11. The document should be referenced in the development of design principles for a site and throughout the more detailed design process.

**Summary of Landscape and Visual Baseline**

**Landscape Elements**

12. The Appraisal Site slopes down from east to west towards a narrow stream. The topography rises back up in Field D towards Hall’s Hole Road. To the east of the Appraisal Site is the top of the ridge and the Tunbridge Wells Circular Walk follows the top of the ridgeline marking a transition route to the wider open areas of the High Weald AONB. This elevated landform encloses the settlement area and much of the Appraisal Site from the open landscape to the east. The undulating topography, with its narrow ghyll streams and valleys is an important part of the local character that is represented in the Appraisal Site.
13. A variety of land uses abut the Appraisal Site to the west including recreation and residential. The residential area of Hawkenbury is located to the southeast of Royal Tunbridge Wells and encloses the western edge of Field A. This residential area is expanding eastwards on account of the Land at Hawkenbury Farm (Policy AL/GB3) residential allocation which was removed from the Green Belt in order to provide a land reserve to meet future development needs. Construction has begun on this site which is located circa 250m to the south of the Appraisal Site and separated from it by the Hawkenbury Recreation Ground.

14. Vegetation within the Appraisal Site relates to a fragmented structure of field hedgerows and scattered trees (mainly oak). A well maintained native hedgerow encloses both sides of High Woods Lane which is also part of the Tunbridge Wells Circular Walk and contributes to its rural character. In the surrounding landscape, High Wood is a significant area of Ancient Woodland that is a prominent feature on the ridgetop in views looking out to the surrounding landscape from the edge of the town.

15. Built form within the Appraisal Site is currently limited to a dilapidated barn used for storage and logging activities. The adjacent indoor bowls club is a single storey brick and metal, barn-like structure with low pitch roof. The residential properties along Cleeve Avenue are bungalows that sit behind a mature tree belt and grass verge. Properties along Sherborne Close are more exposed to the Appraisal Site and comprise two storey apartment blocks constructed in brick. A series of residential properties are located to either side of Hall’s Hole Road and the Hawkenbury allotments with small scale structures contribute to an urban fringe character.

Landscape Character Context

16. The Appraisal Site is located within Landscape Character Area (LCA) 19: Bayhall Open Farmland within both the 2011 and 2017 Borough Landscape Character Assessments. The latter was produced as part of the evidence base to inform the emerging Tunbridge Wells Local Plan. The key characteristics of the LCA are:

- Distinctive topography with a high sandstone ridge providing extensive, panoramic views out across the successive wooded ridges of the High Weald.
- An open arable ridgetop with local contours and undulations infilled and smoothed out creating a bland, expansive character lacking local landscape detail.
- Intersecting valleys to the north and south provide areas of diversity with permanent pasture and ghyll woodlands.
- Blocks of woodland on the ridgetop are a very important landscape feature and ecological resource.
- Large ‘historic’ farm complexes dispersed across the area on the upper slopes.
- Ancient routeways running along the ridgelines, now forming rural lanes, tracks and recreational footpaths, particularly the High Weald Landscape Trail.
- At the northern and western edges of the area, an ornamental/parkland character providing a transition between Royal Tunbridge Wells town and the wider countryside.
• The remnant historic landscape of medieval assart fields, wooded shaw boundaries and ancient routeways which retains a rural character despite the area’s proximity to Royal Tunbridge Wells.

17. The loss of small-scale features including copses and field boundaries is described as degrading the local character. The guidance provided for the LCA includes maintaining the pleasant rural character of the valleys; promoting local recreational routes including the network of local footpaths which link with the Tunbridge Wells Circular Walk; and, sustaining appropriate woodland management at High Wood.

18. The Appraisal Site has been compared with the character area of the Bayhall Open Farmland as described within the district studies. It was considered that the Appraisal Site reflects some, but not all of the described key characteristics of the wider LCA through its sandstone ridge topography, arable land use and ancient routeways. However, the Appraisal Site is somewhat separated from the large scale open ridgetop to the east and does not share the visual associations with the wider High Weald AONB that are present within these areas. The Appraisal Site also does not include any historic farm complexes and is influenced by the ‘creeping’ edge of Royal Tunbridge Wells. The described degradation of the local character through the loss of field boundaries and woodland copses is recognisable in the Appraisal Site and presents an opportunity for enhancement of the landscape character.

19. In terms of landscape capacity, the fields within the Appraisal Site have been considered in the ‘Landscape Sensitivity Assessment of Countryside around Tunbridge Wells’ (2017) and the ‘Tunbridge Wells Borough Council: Landscape Character Assessment and Capacity Study’ (2009). It is recognised that like the wider assessment Sub-Areas it is located within, the Appraisal Site has a relatively low capacity to accommodate residential development on account of its landscape designations. However, due to much of the landscape surrounding Tunbridge Wells being covered by designations, further consideration of more sensitive sites is required to meet housing provision. The Appraisal Site is located close to the existing urban boundary which, as suggested in the capacity assessments, may have greater scope for development provided a substantial buffer between any new development and Dunorlan Park is provided. It is considered that the Appraisal Site is less sensitive than the wider Sub-Areas due to the visual enclosure from the wider High Weald AONB, the influence of surrounding residential development and the higher sensitivity of the adjacent Dunorlan Park.

Visual Amenity

20. The visibility and visual influence of the Appraisal Site varies in relation to the form and condition of field boundaries and its varying elevation. The visibility of the Appraisal Site to the east is limited by High Wood and the elevated ridge topography. Where the boundary is open to the east, views only extend to the top of this expansive open ridge and the wider High Weald landscape is obscured from view. This landform and woodland provides containment to the Royal Tunbridge Wells settlement edge and the Appraisal Site from the wider landscape to the east.

21. There is greater variety in the visibility of the Appraisal Site in views from the west. The residential properties and mature trees associated with Cleeve Avenue and Sherborne Close enclose the western edge of Field A and the latter properties have open views across the site. The Hawkenbury Recreation Ground to the south is partially contained by a low maintained hedgerow and intermittent mature trees. The mature trees within the wider park provide further screening to the Appraisal Site in views from the west.
22. The narrow ridge topography of Dunorlan Park and the mature vegetation associated with it also provides a degree of enclosure to the Appraisal Site from the wider areas of Tunbridge Wells. In views looking out of the Appraisal Site from the eastern boundary of Field B, identifiable features on the western side of the valley include Hawkenbury allotment, the spire of St Peter’s church which is a key landmark in the town, the row of residential properties facing east on Hall’s Hole Road, the indoor bowls club and glimpses of the open areas within Dunorlan Park. A greater extent of built form would be visible during winter months.

23. The arable fields that frame High Wood within Field B are set on the highest part of the Appraisal Site and can be seen in filtered views from Hall’s Hole Road and Dunorlan Park. The Ancient Woodland is a prominent feature on the skyline.

24. Within Fields C and D, the lower lying areas are contained by the adjacent valley sides. The hedgerow to the eastern boundary of Field C is glimpsed in views from Dunorlan Park at the top of the slope. The south western corner of Field D is also elevated and is more visible in the wider area, although the hedgerow and trees along Hall’s Hole Road do provide some enclosure.

25. In summary, the Appraisal Site is well contained from the wider landscape to the east. The more elevated parts of the Appraisal Site, to its eastern side have a greater degree of visibility from the surrounding area although views are generally glimpsed or filtered by intervening features. Field A has a stronger visual relationship with the settlement edge and is more contained in views from Dunorlan Park than Fields B, C and D.

Key Visual Receptors

26. The key receptors which have been identified as having existing views of the Appraisal Site or have the potential to be affected if development were introduced on the Appraisal Site are:

- Hawkenbury Recreation Ground
- Residents of Cleeve Avenue and Sherborne Close
- Pedestrians and motorists on Chester Avenue and High Woods Lane
- Tunbridge Wells Circular Walk
- Motorists and residents on Hall’s Hole Road
- Users of the Hawkenbury Allotments
- Visitors to Dunorlan Park

27. A selection of representative views from a number of these key visual receptors is set out on the following pages.
Figure 1: View north from near the Hawkenbury Recreation Ground bowling green. Glimpses of the Appraisal Site’s Fields A, B and C are seen above the boundary hedgerow.

Figure 2: View from High Woods Lane at the junction with Chester Avenue. The more elevated parts of Field B and existing mature trees are seen above the intervening hedgerow and the Tunbridge Wells Royals Indoor Bowls Club building.
Figure 3: View from Tunbridge Wells Circular Walk at the entrance to Mousden Farm. The Appraisal Site is obscured by the intervening landform. The corner of High Wood which falls adjacent to the Appraisal Site is visible.

Figure 4: View from Hall’s Hole Road looking east towards the Appraisal Site. The elevated parts of Fields A and B which are glimpsed above the roadside hedgerow and High Wood forms the wooded horizon line.
Summary of Green Belt Context

28. The Appraisal Site falls within an area of Green Belt which surrounds Royal Tunbridge Wells and the adjacent residential areas of Hawkenbury and Pembury. The most recent Green Belt Study which covers the Appraisal Site is the ‘Tunbridge Wells Green Belt Study’ (produced by Land Use Consultants in 2017). The study provides a strategic assessment of the contribution of different ‘Broad Areas’ or ‘Parcels’ of land to each of the purposes of Green Belt using a five point scale from high to low. An overall rating was then given to each parcel to indicate the level of harm that could be caused to the Green Belt should the parcel in question be released as follows:

- **Makes a STRONG contribution to one or more GB purposes** – Very High level of harm
- **Makes a RELATIVELY STRONG contribution to one or more GB purposes. No strong contribution to any purpose** – High level of harm
- **Makes a MODERATE contribution to one or more GB purposes. No strong or relatively strong contribution to any purpose** – Moderate level of harm
- **Makes a RELATIVELY WEAK contribution to one or more GB purposes. No strong, relatively strong or moderate contribution to any purpose** – Low level of harm
- **Makes a WEAK/NO contribution to one or more GB purposes. No strong, relatively strong, moderate or relatively weak contribution to any purpose** – Very Low level of harm

29. Fields B, C and D are located within Broad Area BA6. They represent a very small part of BA6 which also includes Dunorlan Park and extends east as far as Great Sandhurst Wood. The Broad Areas represent parts of the borough which were considered to clearly make a strong contribution to one or more Green Belt purposes in the Strategic Study and are areas of countryside that are distinct from the urban development. The key consideration for BA6 was “Contribution to preventing countryside encroachment and role in historic setting of Tunbridge Wells”.

Figure 5: View from Dunorlan Park looking southeast across the lake towards the surrounding countryside. Small parts of the Appraisal Site are glimpsed between intervening mature trees.
30. Field A was considered within a further subdivided Parcel – TW6a. This parcel also includes the Hawkenbury Recreation Ground and the key consideration for the parcel was the “Relationship between settlement and countryside, with reference to role of High Wood in forming barrier to encroachment/sprawl”.

31. A summary of the 2017 Green Belt assessment for Broad Area BA6 and Parcel TW6a is provided below together with commentary on the role of the Appraisal Site within this.

Broad Area BA6 (including Fields B, C and D of the Appraisal Site)

32. **Purpose 1** - Check the unrestricted sprawl of large built-up areas – This area was assessed as making a ‘Strong’ contribution to this purpose due to the area being adjacent to the large built up area but having some separation from it. The study states that development would represent significant expansion of the large built up area into the countryside.

33. Fields B, C and D are located adjacent to Dunorlan Park rather than the settlement edge and resultanty have less association with the settlement edge than the wider broad area BA6. On account of the ridge topography to the east it also has a reduced relationship with the wider countryside than the Broad Area. Fields B, C and D are considered to make a lower contribution to Purpose 1 than the wider Broad Area BA6 due to it having a degree of separation from both the wider countryside and the built-up area. Consequently, the northern parcel of the Appraisal Site is considered to make a ‘Moderate’ Contribution to Purpose 1.

34. **Purpose 2** - Prevent neighbouring towns merging into one another – The broad BA6 area was considered to make a ‘Strong’ contribution to this purpose due to it occupying a gap between Royal Tunbridge Wells and Pembury to the north. The study states that development of the parcel would result in physical or visual coalescence of towns or significant narrowing of the physical gap.

35. The edge of Pembury is over 2km away from the Appraisal Site and on account of intervening topography and woodland has no perceivable relationship with this settlement area. Development of the northern parcel of the Appraisal Site would result in little or no perception of the narrowing of the gap between towns and it is therefore considered to make ‘Weak/No’ contribution to Purpose 2.

36. **Purpose 3** - Assist in safeguarding the countryside from encroachment – Broad Area BA6 was identified as making a ‘Strong’ contribution to this purpose due to it relating strongly to the wider countryside and having a sense of separation from the settlement.

37. Fields B, C and D are considered to contribute to purpose 3 albeit to a lesser extent than the wider broad area due to the closer proximity to the settlement edge and the influence of topography which provides a degree of separation from the wider countryside. The lack of a defined boundary to the eastern edge of the parcel slightly increases this areas relationship with the wider countryside. It is considered to make a ‘Moderate’ contribution to Purpose 3.

38. **Purpose 4** - To preserve the special character of historic towns – The area was also considered to make a ‘Strong’ contribution to this purpose with the ridge crest said to mark the outer edge of the town’s historic areas. The ridges within the parcel are described as some of the highest in the borough and are described as making a contribution to the setting and special character of Royal Tunbridge Wells.
39. The contribution to this purpose is made most strongly by Dunorlan Park which is a key feature on the edge of the historic town. However, the parcel does form part of the setting to the edge of both the Tunbridge Wells Conservation Area and Dunorlan Park and is glimpsed in some key views from the latter. For this reason it is considered to make a ‘Moderate’ contribution to Purpose 4.

40. **Purpose 5 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – No assessment is made against purpose 5 as it is considered to be equally applicable across the Green Belt as a whole.

41. In summary, the northern side of the Appraisal Site makes a ‘Moderate’ contribution to three of the Green Belt purposes which is identified in the Green Belt study as having the potential to cause a ‘Moderate’ level of harm should the parcel be released. It is considered to be significantly less important in Green Belt terms than the Broad Area as a whole.

**Parcel TW6a (including Field A of the Appraisal Site)**

42. Parcel TW6a includes the Hawkenbury Recreation Ground which is included within the ‘Limits to Built Development’ and is therefore not within the Green Belt.

43. **Purpose 1 - Check the unrestricted sprawl of large built-up areas** – The parcel is described as being adjacent to the large built-up area but having a degree of separation from both the settlement edge and the wider countryside. The study states that the western side of the parcel has an even stronger relationship with the urban area but was too small to be assessed as a separate strategic parcel. The parcel was described as making a ‘Moderate’ contribution to Purpose 1.

44. When considering Field A of the Appraisal Site independently, it is considered to contribute less to Purpose 1 than the Parcel TW6a. This is due to the direct association with the settlement edge to the west and the formal recreation ground to the south. The presence of High Wood and the indoor bowls centre also increases the separation from the wider countryside. The southern parcel is considered to make a ‘Relatively Weak’ contribution to Purpose 1.

45. **Purpose 2 - Prevent neighbouring towns merging into one another** – the Green Belt Study states that development of this parcel would result in little or no perception of the narrowing of the gap between towns and therefore makes a ‘Weak or No’ contribution to Purpose 2. This rating is also considered appropriate to Field A.

46. **Purpose 3 - Assist in safeguarding the countryside from encroachment** – Similarly to Purpose 1, Parcel TW6a is described as making a ‘Moderate’ contribution to Purpose 3 due to it having a degree of separation from both the settlement and the wider countryside.

47. It is considered that Field A is a relatively self-contained unit that is influenced by the overlooking residential development on the settlement edge. It is also relatively contained from the wider countryside on account of the enclosure formed by topography and High Wood. It is therefore considered that the southern parcel makes a ‘Relatively Weak’ contribution to Purpose 3.

48. **Purpose 4 - To preserve the special character of historic towns** – the study recognises the arable field to the north of Parcel TW6a (within the Appraisal Site) as an element in views from Dunorlan Park forming the foreground to High Wood. It is identified as making a ‘Moderate’ contribution to Purpose 4 and this rating is also considered appropriate for the southern parcel.
49. **Purpose 5 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – No assessment is made against purpose 5 as it is considered to be equally applicable across the Green Belt as a whole.

50. In summary, Field A is considered to make a 'Moderate' contribution to one of the Green Belt purposes which is defined as resulting in a 'Moderate' level of harm should it be released. This is the same as Parcel TW6a as a whole. However, for some purposes Field A is considered to contribute to a lesser degree than Parcel TW6a as a whole.

51. Overall, the wider function of the Green Belt would not be undermined by the development of the Appraisal Site, provided the identified development principles for mitigation are followed and the more elevated parts of the site are kept free from development.

**Landscape Opportunities and Constraints**

52. The key landscape opportunities and constraints which have been identified following the initial landscape and visual appraisal of the Appraisal Site are illustrated on Figure 1. The opportunities and constraints are summarised below:

- Views of the Appraisal Site from the surrounding landscape to the east, including the wider extent of the High Weald AONB are limited by the mature vegetation within High Wood and the ridgetop topography;

- The lower lying parts of the Appraisal Site, particularly within Fields B, C and D are considered to be less sensitive on account of their greater visual enclosure and Field D falling outside of the AONB boundary;

- The more elevated parts of the Appraisal Site, particularly the eastern edges of Fields A, B and C and the western edge of Field D are considered to be of higher sensitivity on account of their visibility in views from the eastern edge of Royal Tunbridge Wells and Dunorlan Park.

- Field A is located adjacent to the existing settlement edge of Tunbridge Wells and the Hawkenbury Recreation Ground. There is the potential to extend the recreation ground with the implementation of consented sports pitches within Field A. On account of the potential to form a continuation of the existing settlement pattern to the east of the Hawkenbury residential area and the self-contained nature of this field, consideration could also be made to providing residential development here with the sports pitches provided within Field B;

- High Wood Ancient Woodland encloses the eastern edge of the Appraisal Site and is one of the key components of the High Weald AONB landscape which must be retained and enhanced. Standing Advice from Natural England and the Forestry Commission, which is a ‘material’ planning consideration states that a minimum buffer zone of 15m must be provided between the Ancient Woodland and any proposed development. This must be a zone of semi-natural habitat (not domestic gardens);

- The Tunbridge Wells Circular Walk is an important recreational route through the borough and residential development should be appropriately offset with a positive frontage to the route. There is an opportunity to provide a footpath connection through the Appraisal Site.
that connects the Hawkenbury Recreation Ground with the Tunbridge Wells Circular Walk and Dunorlan Park;

- The parcel lies within the Green Belt and the fields to the east of the stream fall within the High Weald AONB. The introduction of development in the area would need to be of a high quality, respond to the AONB guidelines for development and be of an appropriate scale and character to the local context;

- Existing hedgerow boundaries and trees are valuable landscape features within the Appraisal Site which would benefit from retention and reinforcement with additional planting and a regular management regime.

- The northern fields comprise a narrow valley with the most elevated parts to the southeast, rising above 130m AOD. The eastern elevated slopes of Fields B and C are most visually sensitive and development proposals should ensure that building heights do not obscure views towards High Wood at the top of the ridge or detract from the rural setting of Tunbridge Wells. Open space could be provided within the upper parts of the parcel to allow enjoyment of views towards the edge of Royal Tunbridge Wells including St Peter’s Church;

- The ghyll stream that cuts through the northern fields is a local landscape feature that is one of the key components of the High Wealds AONB that should be retained and enhanced within any development proposals;

- Field D lies adjacent to Dunorlan Park Registered Park and Garden and the edge of the Tunbridge Well Conservation Area. A generous landscape buffer should be provided along the western boundary and further advice should be sought from a Heritage Consultant in relation to potential effects on the settings of these heritage assets.

**Key Development Principles**

53. An indicative Framework Masterplan accompanies this note and responds to the landscape opportunities and constraints identified above. This would accommodate approximately 250 dwellings with associated open space and sports pitches on the site. The Framework Masterplan is based on the following key development principles:

- The most elevated parts of Fields B and C set on rising slopes to the east of the Appraisal Site are to be kept free from built development. Residential development to be kept below the 130m contour line to preserve views to the open ridgetop;

- The minimum 15m wide semi-natural buffer to High Wood Ancient Woodland is to be provided. A public footpath is to be provided to the outer edge of this within a green corridor alongside the proposed sports pitches. To the north of High Woods Lane, the public footpath would extend within open space to enjoy panoramic views towards the town and Dunorlan Park;

- Wide buffer maintained between development within Field D and Dunorlan Park to allow for new planting on the high ground, restricting development to the lower slopes to preserve some views of the wider agricultural landscape and High Wood;
• Landscape structure of hedgerows and hedgerow trees retained and reinforced with additional planting, including a new tree belt and woodland copse following the top of the ridge providing a linked wildlife corridor between High Wood and the existing landscape framework;

• Open space to be provided alongside the narrow ghyll stream with a positive frontage to the development facing on to this;

• Built development to be set back from High Woods Lane / Tunbridge Wells Circular Walk creating a green corridor to the development frontage;

• Built development should not be higher than two storeys to reflect the character of adjacent residential areas and to minimise potential visibility from the wider landscape to the east. It should be of high quality and reflect the High Weald guidance on the selection and use of colour in development;

• Sports pitches to be positioned to comply with orientation recommendations whilst minimising the amount of cut and fill on the sloping landscape. Terraces to be used to accommodate changes to levels; and,

• Additional allotment space to be provided adjacent to the existing allotment which is currently occupied by the barn.

• In order to reduce the potential adverse effects through the loss of open land within the High Weald AONB, the following elements seek to preserve and enhance the special characteristics of the AONB in line with guidance set out in the management plan:

  o Increased connections between residential areas and the surrounding countryside through additional pedestrians routes and opportunities to enjoy the AONB;

  o Built development to be of high architectural quality which is sympathetic in terms of colour and materials to the rural landscape context;

  o The ancient routeway of the Tunbridge Wells Circular Walk is retained within the layout with enhancements to existing landscape features alongside the path;

  o Sufficient offset provided to High Wood ancient woodland with semi-natural buffer zones alongside; and

  o Enhancements to the landscape structure and field boundaries through the additional planting of native tree belts, woodland copse and hedgerows.

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Appendix 2: Framework Masterplan