



Representations to Tunbridge Wells Local Plan Consultation: Preferred
Options (Reg 18)

Land at Tutty's Farm, Hawkenbury

November 2019

1. INTRODUCTION

- 1.1. This representation is submitted by Berkeley Strategic Land Limited (“Berkeley”) in response to the Tunbridge Wells Local Plan Regulation 18 Preferred Options consultation.
- 1.2. Berkeley welcome the opportunity to continue to be involved in the local planning process and provide comments on the Draft Plan. Berkeley always seek to become involved in the plan-making process as early as possible and as a Group we value continuous engagement with the Local Authority.
- 1.3. Berkeley has control of land located at Tutty’s Farm, Hawkenbury. The land lies to the southeast of Tunbridge Wells and amounts to approximately 17.2 acres in size.
- 1.4. The site plan is attached at Appendix 1.

2. VISION AND OBJECTIVES 1

- 2.1. Berkeley agrees that the Council should look to disperse growth across the Borough, however we believe that there is a disproportionate level of growth towards Tudeley Garden Village and the multiple sites within the settlement of Paddock Wood as is outlined and discussed in section 4 of these representations.

- 2.2. We support and agree with the Council regards the

“High quality development at other settlements across the borough will have been realised, with the timely provision of relevant infrastructure. The growth of these settlements will have reflected local input and circumstance, including through assessment against neighbourhood plans”

- 2.3. Berkeley also support the importance of maintaining and supporting growth across the rural areas of the Borough, which are plentiful across the Borough of Tunbridge Wells.

“Rural enterprise will have been supported, and the exceptional quality of the built and natural environments will have been protected and enhanced”.

- 2.4. We support the proposals for the high quality design, connectivity, active travel and an appropriate mix of uses as outlined within the vision;

“All developments will be of high quality design, having responded to the distinctive and particular character of their locations: in some instances the development will have taken place within valued and protected landscapes, and this will be recognised in the quality of the design of the development, the protection and enhancement of the exceptional quality of the built, natural, and historic environment, and the provision and protection of landscape features and green spaces. Green, grey and blue infrastructure will be an integral and defining

element in the design and layout of new developments, with opportunities for inclusion of public art and improved cultural provision to have been realised”.

“At the heart of all development in the borough will be connectivity, active travel, an appropriate mix of uses and accommodation and, above all, the timely delivery of relevant infrastructure, which will have been funded by development: this infrastructure will have mitigated the impact of development, and, wherever possible, resulted in 'betterment' for existing residents, users, businesses, visitors, etc”.

3. VISION AND OBJECTIVES 2

- 3.1** Berkeley agree and supports the 10 strategic objectives of the Vision and Objectives 2 and should be applied to each development where applicable.
- 3.2** If the Tutty’s Farm site was to come forward as an allocation within the Local Plan it would accord with the strategic objectives of the Local Plan.

4. THE DEVELOPMENT STRATEGY & STRATEGIC POLICIES

- 4.1.** Berkeley welcome the Borough Councils proposal to meet the objectively assessed housing need for the Borough over the plan period to 2036, which is a minimum of 13,560 homes or 678 dwellings per annum.

The Development Strategy

- 4.2.** It is noted that there are a minimum of 7,593 dwellings need to be allocated on new sites as part of the local plan. Berkeley support the allocation of sites to meet the housing need in full.
- 4.3.** In the previous consultation of the Plan the Council proposed a number of growth options for the local plan, which were;
 - **Option 1: Focused Growth:** Development distribution focused as per existing Core Strategy, i.e. majority of new development directed to Royal Tunbridge Wells/Southborough, a smaller proportion to the other three main settlements of Paddock Wood, Cranbrook and Hawkhurst and limited development within the villages and rural areas.
 - **Option 2: Semi-Dispersed Growth:** Development distribution semi-dispersed, with the majority of new development directed to Royal Tunbridge Wells/Southborough and a proportion distributed to the other three main settlements of Paddock Wood, Cranbrook and Hawkhurst (as per Option 1), but additionally a percentage of development directed to some of the larger villages (taking account of the updated settlement hierarchy work). Limited development within the remaining villages and rural areas.

- **Option 3: Dispersed Growth:** Development distribution proportional across all of the borough's settlements.
- **Option 4: Growth Corridor-led Approach:** Development distribution focused around the A21, close to Royal Tunbridge Wells and Pembury, as a new 'growth corridor'.
- **Option 5: New Settlement Growth:** New freestanding 'Garden Village' settlement. There is no location identified with this option. A new settlement could be located anywhere within the borough (we are inviting views on the principle of a new settlement in providing for the future development needs of the borough).

4.4. The Council have outlined within the Plan at paragraph 4.38 that their proposed strategy will be a combination of Option 3 and Option 5, being dispersed growth and new settlement growth.

4.5. However, we feel that the actual provision of development in particular the distribution of housing does not accord with these options and an unbalanced distribution is proposed, which does also not accord with the tiers of the settlement hierarchy.

4.6. The distribution of housing of new allocations is;

1. Royal Tunbridge Wells & Southborough : 1,222 – 1,320 & 205 homes
2. Paddock Wood: 4,000 homes
3. Tudeley Village: 1,900 in Plan period (2,500 – 2,800 homes)
4. Cranbrook: 900 homes
5. Hawkhurst: c. 700 homes
6. All other settlements c. 950 homes
7. **Total New allocations: 9,500 approx. dwellings in the Plan period.**

4.7. Although the Council are proposing to allocate housing sites that will deliver above their need we still feel there is a disproportionate split across key settlements. Based on a rough percentage split this distribution of development is set out below;

1. Royal Tunbridge Wells & Southborough : 15%
2. Paddock Wood: 40%
3. Tudeley Village: 20%
4. Cranbrook: 10%
5. Hawkhurst: 5%
6. All other settlements c. 10%

4.8. It is clear from the above evidence that the distribution of development is not evenly dispersed or proportionate to the scale of settlement as is proposed by the Council within Option 3. As such the housing provision split is not consistent with Option 3 despite being the selected option.

4.9. A large imbalance in favour of Paddock Wood exists, which has over 60% more growth compared to the primary town in the Borough of Royal Tunbridge Wells,

which despite being the most sustainable settlement within the Borough has a mere 15% of allocations compared to Paddock Woods 40%. Further constraints exist within the Paddock Wood allocations as outlined in para 4.21-4.23.

- 4.10.** Similarly the newly proposed Tudeley Garden Village accounts for 20% of the total new allocations, which is a large over-reliance of meeting the Borough's housing needs as discussed further in para 4.24 and 4.25.
- 4.11.** We support the level of growth proposed elsewhere including the sustainable settlement of Cranbrook, which could provide for additional growth if required.
- 4.12.** The rate or split of this distribution should be based on the settlement groupings/hierarchy, which can achieve a distribution of development, which is proportionate to the scale of each settlement. The settlements are tiered in a logical order where settlements are placed in terms of the most sustainable locations for development placed highest in the hierarchy. It is vital to continue to direct development in line with the settlement groupings/hierarchy, which will ensure that sustainable locations are developed and gives the borough the best opportunity to meet its required needs
- 4.13.** The smaller settlements further down the hierarchy are smaller in size, less sustainable and more constrained meaning they are not capable of delivering and supporting the same level of development as settlements that are positioned in the top tiers of the settlement groupings.
- 4.14.** The top three tiers of the hierarchy are;
1. Primary Regional Town Centre: Royal Tunbridge Wells
 2. Town Centre: Cranbrook, Paddock Wood, Southborough
 3. Rural Service Centre: Hawkhurst
- 4.15.** As noted above Royal Tunbridge Wells is the Primary Regional Town Centre within the Borough making it the most sustainable, however only 15% of new housing allocations have been designated to Royal Tunbridge Wells. It is our view that additional housing sites will be required due to the unsuitability and over-reliance of other proposed housing allocations. The obvious rebalance of new growth is to allocate further land within Royal Tunbridge Wells.
- 4.16.** Berkeley Strategic are promoting Tutty's Farm for approximately 100 homes, which has not been included within the Draft Plan as a proposed allocation. The site sits in a sustainable location lying adjacent to the top tier settlement of Royal Tunbridge Wells. This site adjoins the existing Berkeley allocation at Hawkenbury Farm now known as Hollyfields, which is currently under construction for 243 homes and a primary school. The development of Tutty's Farm would be a logical and natural extension to Hollyfields.
- 4.17.** The site is suitable and deliverable as is outlined in Sections 12-21, is owned by Berkeley and could come forward early in the plan period to contribute to land supply in advance of larger, more complex allocations coming forward. Furthermore this would aid with the Boroughs five year housing land supply. The site lies within the Green Belt but it is our view and supported by our recent Green Belt Review and Landscape Appraisal study that is at Appendix 2 and summarised in Section 5 that the land is weakly performing Green Belt and its development

would have a negligible effect on the existing landscape due to the sites enclosed nature. It is our view that based on the Boroughs requirements to meet housing need, the constrained nature of the Borough on Green Belt land and the opportunity for our site to provide local benefits is that exceptional circumstances exist.

- 4.18.** Within para 4.32 the Council notes that the Strategic Housing and Economic Land Availability Assessment (SHELAA) was used to develop options for meeting the housing and economic needs of the borough. However, despite the suitability of the site the SHELAA deemed the site unsuitable on the basis of heritage, land use and landscape. There is also some concerns regards highways as well as impact on AONB.
- 4.19.** However, as outlined within sections 12-21 and as demonstrated within the technical work appended to this submission we believe that the Tutty's Farm site is suitable and deliverable and should be allocated within the local plan.
- 4.20.** We propose that the Local Plan is amended to include Tutty's Farm as an allocation within the Plan.
- 4.21.** As mentioned there is a large proportion of new allocations within Paddock Wood amounting to 4,000 new homes within the Plan period or 40% of new allocations. However a large proportion of these sites lie within flood zones 2 & 3. Of the indicatively allocated sites, which amount to approx. 600 acres only 229 acres lie outside of the flood zone, meaning approximately 40% of the allocated sites are within the flood zone and should be deemed unsuitable for residential development.
- 4.22.** Para. 163 of the NPPF states that development should be avoided from areas of flood zone and only permitted where the sequential and exception tests have been passed. As there are other suitable and deliverable sites that have not been proposed for allocation that lie outside flood risk areas we believe that the Plan fails the sequential and exception tests and as such runs the risk of being found unsound at an examination by an Inspector if the Plan was to proceed as proposed.
- 4.23.** From our estimation using an above average net to gross ratio on a sites developable area of 60% on land located outside the floodplain (usually a developer standard is 50%) and applying a density of 15 homes per acre this would only yield 2,000 homes on sites within Paddock Wood opposed to the 4,000 proposed. This creates an undeliverable amount of 2,000 homes as is proposed within the development strategy.
- 4.24.** Similarly the proposal for a garden village at Tudeley comprises 20% of the total new allocations, and with circa 1,900 homes included in the plan period we believe that this is overly-optimistic and practically unachievable. It is well known how new garden villages rely on large levels of strategic infrastructure in order to unlock the site for development and at a scale of 2,500 homes + it is clear that major and lengthy upfront infrastructure will be required in order for Tudeley village to be released.

- 4.25.** From our own experience in dealing with major strategic sites Berkeley have produced an updated trajectory for Tudeley Garden Village, which we believe is a closer estimate to the likely build out rate for the scheme.
- 4.26.** Our estimated trajectory is at Appendix 4. From our estimation we believe that within the Plan Period that Tudeley Garden Village will only provide for 1,450 homes, which is significantly less than the 1,900 homes within the proposed trajectory. This is an additional 450 homes shortfall on the proposed housing allocations. Our estimation is also based on quite optimistic delivery rates of 200 homes per year from year two on site, which could also be questionable and result in an even higher shortfall.
- 4.27.** Together through Berkeley's analysis a total of 2,450 homes are undeliverable on allocated sites, which results in an approximately 550 home shortfall for the Borough in meeting its housing needs.
- 4.28.** As such, it is clear that the Council will need to allocate more deliverable sites in order to meet their need and have a sound adopted Local Plan. The land at Tutty's Farm is a highly sustainable opportunity, which can come forward early in the plan period and deliver the vital homes that this Borough needs.

5. Policy STR 4 – Green Belt

- 5.1.** The entirety of the greenfield land around Royal Tunbridge Wells and extending east towards Paddock Wood all forms part of the Metropolitan Green Belt amounts to some 36% of the total Borough.
- 5.2.** In addition the Kent Downs AONB covers an encompassing 75% of the Borough making Tunbridge Wells a constrained local authority. However, it is clear that exceptional circumstances exist and the Council are required to review the Green Belt in order to meet their objectively assessed housing needs.
- 5.3.** The Council have undertaken a two part Green Belt study, which analyses the weakly performing parcels of the Green Belt that could be warranted for release.
- 5.4.** Tutty's Farm was assessed under parcel "TW6b" and was denoted an overall harm rating of "High".
- 5.5.** Despite a large proportion of other edge of settlement sites being denoted a "very high" level of harm there are a number of sites denoted as "moderate" despite in our view being at a similar level of harm to Tutty's Farm.
- 5.6.** Our Green Belt Review and Landscape Appraisal that analyses the Green Belt study and makes an updated assessment on Tutty's Farm and its contribution to the Green Belt, which is found to be "Low" opposed to the Council's "High" categorisation.
- 5.7.** Furthermore, the two bordering parcels to the north and south of Tutty's Farm (parcels 6a & 7) are both categorised as "Moderate" harm despite both extending further east into the countryside than Tutty's Farm. It seems illogical to us how two adjoining parcels can be a weaker contributor to the Green Belt than a piece of

land between the two that is arguably more enclosed and less exposed to the wider countryside.

- 5.8. We believe that perhaps due consideration to the now changed landscape as a result of the construction of Hollyfields and the primary school had not been accounted for within the Green Belt study.
- 5.9. Tutty's Farm now adjoins the new urban edge to Tunbridge Wells, which as such makes a relatively weak contribution to Purpose 1 of the Green Belt: unrestricted sprawl of large built up areas. This is opposed to the "Relatively Strong" categorisation denoted to the site within the Green Belt Study.
- 5.10. A summary of the contributions Tutty's Farm makes to the Green Belt purposes from our appended Green Belt Review & Landscape Appraisal is set out below;

Our independent assessment of the Green Belt contained within Land at Tutty's Farm, in summary, established the following ratings: -

- **Purpose 1- Check the unrestricted sprawl of large built up areas-Relatively weak**
- **Purpose 2- Prevent neighbouring towns from merging into one another- No contribution**
- **Purpose 3- Assist in safeguarding the countryside from encroachment- Weak/No contribution**
- **Purpose 4- To preserve the special character of historic towns -No Contribution**

Detrimental harm that could result from the release of the Land at Tutty's Farm was assessed as **Low**.

- 5.11. It is our opinion that the Council should re-evaluate Tutty's Farms contribution to the Green Belt as Low combined with the need to meet their housing requirement, its sustainable location and the benefits that the development can deliver mean that exceptional circumstances exist for the removal of the site from the Green Belt. As such combined with the already identified housing shortfall and the sites suitability the site should be included as an allocation within the Local Plan.
- 5.12. A further point of note is that other allocated sites were denoted as a "high" rating within the Green Belt study but were still deemed suitable for allocation such as land to the west of Eridge Road at Spratsbrook Farm, which is allocated for 270 homes. Furthermore, Land at Beechwood Sacred Heart School is allocated for 69 homes and residential care but was found to be at a "Very High" level of harm in the Green belt study.

6. Policy STR 5 – Essential Infrastructure and Connectivity

- 6.1 Berkeley supports Policy STR5 in regards to delivering sufficient infrastructure to ensure the provision of existing and future sufficient infrastructure to support the delivery of new development.

7. Policy STR 7 – Place Shaping and Design

7.1 Berkeley supports Policy STR 7 that a high and continuous quality of urban and architectural design should be enforced on all schemes and development throughout the plan period.

8. Policy H3 – Housing Mix.

8.1 Policy states that proposals for residential development should include a mix that would enable the balanced development of the area, unless alternative mix and size requirements are set out in a Local Plan site allocation or in a 'made' neighbourhood plan. The mix should be informed by analysis of the area within which the site is located. We welcome this flexible approach to housing mix and would encourage the Council to allocate sites that can deliver a variety of homes to meet the needs of different parts of the community for which Tutty's Farm can. We can also deliver affordable housing in line with the requirements of policy H5, which would be well integrated into the development and achieve high quality design. Furthermore, we support the general approach to determining housing density, which states that development should make efficient use of land whilst having regard to its surrounding context. No alterations to this policy are proposed however the Council are encouraged to re-examine Tutty's Farm due to its ability to deliver a variety of homes in a sustainable location.

9. Policy EN15 – Ancient Woodland and Veteran Trees.

9.1 Policy states a 25m buffer to all ancient woodland or veteran trees. A 25m buffer exceeds current Natural England standing advice of 15m, for which there is no policy justification. Placing an excessive buffer around the edge of ancient woodland, leads to large areas becoming undevelopable. This policy should be altered to accord with Natural England advice. Up to 15 metres would still be absent from all development. This will allow sites to be better utilised and maintain the required density which could otherwise prove unachievable.

10. Policy H11 – Self Build

10.1. Berkeley recognises the introduction of self-build and custom housing to the housing market. However, a blanket 5% requirement for custom build housing on all schemes in excess of 100 dwellings, would not necessarily be suitable or achievable for all development sites, such as those with a single point of access where construction would have to be carefully managed to ensure consistency and quality across the development. It is recommended that this policy wording is altered to state its requirement only on suitable sites and where there is a proven demand.

11. Policy H5 – Affordable Housing

11.1. Requires all affordable homes to be built to Building Regulation Standard M4 (2). It is not practical to impose Part M4 (2) standards to all affordable homes, as this requires level access. Achieving level access would not be practical on all sites or all forms of housing. A M4 (2) standard would be difficult to achieve on steeply sloping sites and would not be practical for small apartment buildings. A

commitment to such a standard would commit the developer to implement lift shafts and a registered provider to maintain the lift shafts at great cost. This reference should be removed from the Policy wording. Assessments should be done on a site by site basis.

12. Site Suitability

13. Site Description

- 13.1.** Royal Tunbridge Wells is the principle town in Tunbridge Wells Borough. The town provides a large proportion of the social, cultural and economic opportunities available in the borough.
- 13.2.** In addition to being the Borough's principal retail centre, the town provides a wide variety of services, including primary and secondary schools, and sports and community facilities.
- 13.3.** The town is strategically located lying just to the south of the urban area of Tonbridge connectable via the A21 and A26. The town also has strong train connections that provide commuter services to London in 50 minutes.
- 13.4.** The site is located to the southeast of Tunbridge Wells two miles from the town centre and extends to approximately 17.2 acres and can be seen outlined in red on the site plan at Appendix 1.
- 13.5.** The site is located in a sustainable location with both primary and secondary schools both being easily accessible from the site. A new primary school is being constructed as part of the Hawkenbury Farm site, which would be within walking distance of the Tutty's Farm development. There are six secondary schools located in Tunbridge Wells with the Skinners' Kent Academy closest to the site lying approximately 1.8 miles to the north-east of Tutty's Farm.
- 13.6.** The Hawkenbury Recreation Ground is located approximately 300m to the northwest of the site aswell as local shops and services, which are readily available nearby.
- 13.7.** Tunbridge Wells station is located 1.4 miles from the site and provides direct train services to central London within 45 minutes.
- 13.8.** The site consists of grassland and well established hedgerows which separate the land into six interconnecting parcels.
- 13.9.** The site adjoins the eastern boundary of the existing Berkeley site of Hawkenbury Farm, which received planning consent in February 2017 for 243 homes. The eastern boundary is bounded by an open field and Hawkenbury recreation ground to the north, while existing woodland lies beyond the eastern and southern boundaries of the site.
- 13.10.** The land is designated as Green Belt and in order to allow the site to come forward the land will need to be removed from the Green Belt. Berkeley's assessment of the site against the five purposes of the Green Belt is outlined in

Section 5. The site was previously identified as an area of search for Green Belt review in the draft Site Allocations DPD.

14. Access

- 14.1.** An initial access assessment was carried out has been carried out in 2017 for the site by Glanville, who were also the appointed consultant for the Hawkenbury Farm site.
- 14.2.** An update assessment has now taken place, which uses more up to date available data and agreed traffic flows with Kent County Council Highways, which were used as part of the Hawkenbury Farm application.
- 14.3.** The highways access note is at appendix 4.
- 14.4.** The proposed main site access is to be provided via a safeguarded corridor for a new highway link from the Hawkenbury Farm site. This safeguarded corridor has been designed to ensure that a safe and suitable access can be created into Tutty's Farm that will meet required visibility and highway standards.
- 14.5.** In accordance with KCC standards there will also be an emergency access link provided onto Hawkenbury Road. The drawing of the location and design of this emergency access has been included within Glanville's technical note attached to this submission.
- 14.6.** Parking will be provided for in accordance with KCC and Tunbridge Wells Borough Council standards. This will include provision for on-plot parking with garages, driveways and private parking bays. Cycling parking will also be accounted for in line with county and borough standards.
- 14.7.** Pedestrian and cycle links will be provided throughout the new development with on-road cycling and off road pedestrian footways of 2.0m width, in line with KCC standards. Pedestrian and cycle linkages will also be provided to off-site routes.
- 14.8.** The Hawkenbury Road / Forest Road junction would have capacity on the majority of the movements all though the right turn movement would be at capacity. However, due to the location of the connection with Hawkenbury Farm, it is considered that the majority of traffic would utilise Forest Way.
- 14.9.** The Forest Way / Forest Road junction would have sufficient capacity to accommodate the Tutty's Farm flows following the completion of the Hawkenbury Farm improvements.
- 14.10.** Any future planning application would include further traffic modelling to determine the reserve capacity of the Hawkenbury Road and Forest Way junctions to serve the Tutty's Farm development. This will include new traffic surveys to assess the impact of the completion of the A21 duelling, completed in 2017, on Hawkenbury Road. It is considered likely that an acceptable traffic solution can be identified for the two aforementioned junctions as the A21 duelling is proposed to reduce congestion and accidents on the A21, which will benefit wide journey to

and from the site using this road and has removed diverted traffic away from Forest Road.

15. Green Belt & Landscape

- 15.1.** Although the land is within the Green Belt as is all of surrounding Royal Tunbridge Wells the site is not within the AONB, which approx. 75% of the Borough is designated as.
- 15.2.** Although the adjoining wooded triangular parcel on the eastern boundary of the site is within the AONB and under Berkeley ownership this land does not fall within the red line of the site. Furthermore this land is designated as dormouse mitigation land as part of the consent Hawkenbury Farm scheme.
- 15.3.** The landscape section of the Green Belt Review and Landscape Appraisal Summary concludes that that views into the site including from the AONB are limited. The eastern boundary of the proposed site is strongly wooded and as such provides a natural stop to the urban edge, which beyond the woodland the AONB and open countryside begin.
- 15.4.** The Green Belt Review and Landscape Appraisal Summary mentioned within Section 5: Green Belt is at appendix 2.
- 15.5.** As mentioned in Section 5 the Green Belt summary provides an analysis of the sites contribution to the purposes of the Green Belt, which we deem as “low” and not “moderate” as classified within the Council’s Green Belt study.
- 15.6.** The landscape section outlines and explains how the site is contained to the north by Hawkenbury Road and by the residential properties of Hawkenbury Farm and Hawkenbury Farm House and their respective curtilages. In addition, the Site is contained by the mature woodland of Benhall Wood to the south, with further woodland and agricultural land to the east. The substantial nature of this mature vegetation creates a strong landscape framework that creates physical and visual enclosure to the site and the south eastern corner of Tunbridge Wells.
- 15.7.** The landscape section picks up on the varying topography of the site, which generally slopes steadily from a high point in the north to a low point in the south-east of the site.
- 15.8.** The primary visual receptors to any residential development on the site would be limited to the existing nearby residential properties, the users of the public right of way and the users of Hawkenbury Road.
- 15.9.** This work concludes that the site’s contribution to the character of the wider landscape in visual terms is limited. The size of the site means that residential development would have the potential to enhance the landscape character of the site and the wider area through the retention and management of existing landscape features and the opportunity to provide new tree and hedgerow planting. This approach would ensure that the impact on the wider landscape would be negligible as a result of the development of Tutty’s Farm.

16. Flooding

16.1. The Environment Agency Flood Maps show the site to be entirely within Flood Zone 1 meaning it is at the lowest risk of flooding.

17. Archaeology

17.1. There are no archaeological features or finds within the site according to the Historic Environment Records maintained by Kent and East Sussex County Councils.

17.2. If the site were to come forward within the emerging Local Plan, further archaeological works would be undertaken in order to fully assess the archaeological potential of the site.

18. Heritage

18.1. Although there are a number of heritage assets present throughout Tunbridge Wells there are no designated or non-designated heritage assets in the immediate area surrounding the site.

18.2. Furthermore, the site is also not nearby the Royal Tunbridge Wells Conservation Area.

18.3. Heritage concerns were mentioned within the SHELAA due to the potential likely impact on the settlement edge and landscape setting of Tunbridge Wells. However, as now the adjoining Hollyfields is under construction and adjoins Tutty's Farm forming a new urban edge it is clear that the proposed site would act as a logical and natural extension to Hollyfields.

18.4. As such, it is considered that local heritage assets will not have an impact on the potential development of Tutty's Farm.

19. Ecology

19.1. The site is not subject to any statutory or non-statutory nature designations such as Sites of Special Scientific Interest (SSSI) or Local Nature Reserves (LNR).

19.2. Part of the south east corner of the site holds a non-statutory nature conservation designation being a Local Wildlife Site (LWS). This part of the site is not included in the potential developable area. The area will be retained and incorporated into the landscape and ecological management plan for the site.

19.3. The ecological site assessment for the Hawkenbury Farm site identified the potential for dormice to be present on site. The recommended mitigation measures include the retention of hedgerows, buffer strips and new woodland planting. It is likely that similar sensitivities may be identified within Tutty's Farm, which will also require the appropriate mitigation. There is ample room within Tutty's Farm to support any dormice or other ecological mitigation where required.

19.4. Furthermore, there is potential for net-biodiversity gain through enhanced planting and management of landscape features within the site.

19.5. If the site was to come forward as part of the Local Plan full ecological works would be undertaken.

20. Arboriculture

20.1. There are a number of hedgerows within and along the boundary of the site, however there are no trees that are subject to any tree preservation orders within the site.

20.2. The woodland to the south of the site is designated as Ancient Woodland.

20.3. As part of any potential development the existing arboriculture will be maintained to their full extent where possible and incorporated into any potential scheme.

21. Site Masterplan

21.1. An initial site masterplan has been produced, which outlines an indicative layout for the site. This conceptual drawing responds directly to the opportunities and constraints that the site is subjected to in order to ensure that the most appropriate land-uses are considered for each area of the site.

21.2. The indicative layout could provide for approximately 100 homes.

21.3. The scheme includes a range of house types with a mix of 2, 3, 4 and 5 bed homes that are both detached and semi-detached.

21.4. The current layout also provides a proportion of affordable housing, which includes a blend of both shared ownership and affordable/social rent. These affordable units will be pepper potted across the site to ensure there is a strong variation and mix between the location of both private and affordable units.

21.5. The masterplan is at appendix 5.

21.6. Tutty's Farm could deliver additional benefits if it was developed for the local area including;

- Bio-diversity gain
- Investment in Hawkenbury Recreation Ground
- Investment in Hawkenbury Allotments
- Investment in Hawkenbury Bowles Club

22. Conclusions

22.1. Berkeley support the Council's provisions to seek to meet their housing needs of the Borough of a minimum of 13,560 homes (678 per year) up to 2036.

22.2. We can support the Council's decision to propose Option 3 a dispersed growth for the development strategy for the Borough along with a new garden village,

however we believe that there is an unbalanced growth set out within the housing provision of the new allocations.

- 22.3.** An over-reliance on Tudeley Garden Village we estimate will result in 450 homes being undeliverable while approx. 2,000 homes within the Paddock Wood allocations lie within flood zone 3 and are unsuitable.
- 22.4.** Together we believe that there is a 550 homes shortfall within the Plan period.
- 22.5.** The Council will need to allocate further sites to meet their housing needs. They should first look to the top tier of the hierarchy to its most sustainable settlement of Royal Tunbridge Wells.
- 22.6.** Tutty's Farm is not proposed for allocation, however it has been demonstrated throughout these reps along with the technical documents appended that it is a suitable and deliverable site, performs weakly in terms of purposes of the Green Belt, is in a sustainable location and can provide additional local benefits, which together amounts to proving that exceptional circumstances exist.
- 22.7.** Tutty's Farm is already within Berkeley's ownership and would be a logical extension to the Berkeley scheme of Hollyfields that is already under construction.
- 22.8.** The site is suitable and deliverable and we have shown within our Green Belt Review and Landscape Appraisal Summary that its development would be of "Low" harm to the Green Belt.
- 22.9.** The site suitability section outlines that there are no significant or complex constraints that would prejudice the site from coming forward. In addition, through the potential section 106 contributions the Tutty's Farm site could provide investment and improvements to the local area such as improving the recreational ground, local sports clubs or allotments.
- 22.10.** The site is also deliverable without the need for major new infrastructure, which enables early delivery and the ability of the site to contribute to maintaining a five year supply of deliverable sites.
- 22.11.** The allocation of the Tutty's Farm site will assist in meeting TWBCs identified need for market and affordable housing early in the plan period and will thereby contribute to the sustainable growth of the town and benefit the local area of Hawkenbury.
- 22.12.** Furthermore, we wish to work collectively with TWBC and the local community to bring forward proposals for this site.