Local Plan
Planning Policy
Planning Services
Tunbridge Wells Borough Council
Town Hall, Civic Way
Royal Tunbridge Wells
Kent
TN1 1RS

BY EMAIL ONLY

Dear Sir/Madam,

TUNBRIDGE WELLS BOROUGH - DRAFT LOCAL PLAN (REGULATION 18) CONSULTATION

CBRE is appointed by Dandara Ltd. to submit representations relating to the Tunbridge Wells Borough Draft Local Plan (Regulation 18) Consultation which runs between 20th September to 15th November 2019.

Dandara hold specific land interests in respect of the following sites as set out in our representations:

- Badsell Farm, Paddock Wood ("Paddock Wood");
- Land to the west edge of Eridge Road at Spratsbrook Farm ("Spratsbrook Farm");
- Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road ("Sissinghurst"); and
- Land off Copthall Avenue and Highgate Hill, Hawkhurst ("Hawkhurst").

The above sites are located within the administrative area of Tunbridge Wells Borough Council ("TWBC"). The above sites are allocated sites in the Draft

Accordingly, please find the following enclosed representations which will be sent via email and secure electronic file transfer:

- This cover letter;
- Completed Local Plan Response Form; and

CBRE has spoken with TWBC’s Planning Policy Team on the 8th November 2019 who confirmed that Local Plan representations can be submitted in a formal complete report without the need to complete the separate sections of the Response Form. For completeness we have completed the enclosed Response Form to assist Officers. This Response Form requires Officers to cross refer to our enclosed Written Representations Report dated November 2019.
Dandara will continue to engage with TWBC as well as key stakeholders, to feed into and inform later stages in the plan-making process.

Dandara will also continue to monitor the progress of the emerging Local Plan and will also look to make written representations on the next stage (Regulation 19) of the Draft Local Plan.

We would be grateful for confirmation that these representations have been received, and that they have been registered as duly made. We trust this submission is clear and helpful but should there be any queries please let us know.

Yours faithfully,

ANDY PEARCE
SENIOR PLANNER, CBRE
TUNBRIDGE WELLS BOROUGH
LOCAL PLAN – REGULATION 18

On behalf of Dandara Ltd.

Written Representations

November 2019

-dandara
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1.0 Introduction

1.1 CBRE Limited (CBRE) is instructed by Dandara Ltd. (‘Dandara’) to prepare written representations in relation to the Regulation 18 Consultation draft version of the Tunbridge Wells Borough Local Plan (hereafter ‘Draft Local Plan’) (September 2019). The Regulation 18 Consultation period runs between 20th September to 15th November 2019.

1.2 Dandara holds specific land interests in respect of the following sites:
- Badsell Farm, Paddock Wood (‘Paddock Wood’);
- Land to the west edge of Eridge Road at Spratsbrook Farm (‘Spratsbrook Farm’);
- Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road (‘Sissinghurst’);
- Land off Copthall Avenue and Highgate Hill, Hawkhurst (‘Hawkhurst’).

1.3 The above sites are located within the administrative area of Tunbridge Wells Borough Council (‘TWBC’).

1.4 Dandara has submitted written representations in respect to the previous Regulation 18 Issues and Options Consultation draft version of the Tunbridge Wells Borough Local Plan in June 2017.

1.5 These written representations provide comment on the Draft Local Plan proposed policies and strategic issues, as well as context in relation to the promotion of the four above mentioned sites as housing site allocations. Dandara wishes to achieve favourable site allocations for the above sites and is currently undertaking the relevant technical studies to enable prompt application submissions to be made where feasible and appropriate.

1.6 There is sufficient and proportionate evidence to justify the inclusion of the above sites as housing allocations in the emerging Tunbridge Wells Borough Local Plan. Each site represents a sustainable and suitable location for growth. Further technical studies will be robust to provide certainty regarding the site allocation potential and timescale for delivery for each. This will:
- Inform the evidence base, to ensure it is proportionate to support the broad allocation of the site thereby factoring in constraints and mitigation;
- Compare capacity testing to demonstrate the site allocation potential;
- Demonstrate the robustness of the approach to support TWBC through the emerging Local Plan process, and third-party stakeholders.

1.7 An advisory technical team including CBRE (planning advice), JTP (urban design), Define (landscape architects), DHA (flooding/drainage and transport/highways advice) and Turleys (heritage advice) has been appointed to commence this early assessment work, with the purpose of informing the Local Plan process. Each technical consultant has adopted a robust standard methodology and have cross-referred to TWBC’s emerging Local Plan evidence base.

1.8 For Paddock Wood, the consultant technical team are preparing a concept masterplan for the Badsell Farm site which has been informed by the technical assessment work to mitigate the site’s constraints and confirms how this expansion will link to the existing Town.

1.9 Dandara has not submitted any concept masterplan or any illustrative schemes for sites at Paddock Wood and Spratsbrook Farm at this stage. This work will be progressed in the coming months, and for Paddock Wood this will be alongside a Strategic Framework including Infrastructure Delivery Plan. They will be informed by a robust technical evidence base for each site.
1.10 This evidence base will continue to inform Dandara’s Local Plan representations and will be progressed as TWBC’s Local Plan review process advances.

1.11 The Draft Local Plan proposes to include these sites as housing allocations, and as such TWBC has drawn its own conclusions using its evidence base as to the appropriateness for housing development. The assessment work being undertaken by Dandara is independent of this, nevertheless, will be available to TWBC to help inform their plan-making process.

1.12 In addition, Dandara is also actively engaging with TWBC and the variety of landowners, developers and stakeholders through the emerging Local Plan process, to support the progress of the strategic extension to Paddock Wood, including the release of Dandara’s site from the Green Belt and allocation for residential led development. Dandara has, and will continue to participate in, the Stakeholder Forum sessions held in July and September 2019.

1.13 In relation to their land interests at Paddock Wood and Spratsbrook Farm, Dandara’s advisory team has engaged in an initial charrette process, to establish the key constraints and opportunities from the perspective of several technical disciplines, including flood risk, transport, landscape and masterplanning.

1.14 Dandara has also submitted planning applications in respect of their land interests at Sissinghurst (LPA ref. 19/00308/FULL) and Hawkhurst (LPA ref. 18/01063/FULL). Robust technical work has been undertaken as part of the planning application process. Further details of these applications are set out in Section 4.0 of these written representations.

Representations Structure

1.15 These written representations are structured as follows:

- Section 2 provides a brief background to Dandara;
- Section 3 provides comment on the Draft Local Plan vision and strategic policies;
- Section 4 provides site specific comments relating to allocated sites in the Draft Local Plan in respect of which Dandara has a specific land interest;
- Section 5 provides comment on other planning policies and development management policies included within the Draft Local Plan;
- Section 6 considers the requirements of the National Planning Policy Framework (‘NPPF’) (February 2019) regarding Local Plan ‘soundness’, and whether the Draft Local Plan including the proposed site allocations are considered to be capable of being found sound; and
- Section 7 provides a written representations summary and outlines proposed next steps.

1.16 Supporting appendices are enclosed with these written representations.
2.0 Dandara

2.1 Dandara is a UK independent property development company established in 1988. Dandara has been at the forefront of commercial and residential property design and development for nearly three decades, creating award-winning homes and working environments throughout the UK.

2.2 Dandara has an established and experienced land and planning team and aims to work collaboratively with local councils, stakeholders and the local community to deliver developments that meet and exceed the aspirations of all involved in the process.

2.3 Dandara is passionate about quality, which is why they undertake every aspect of the development process themselves; from land buying and planning, to design, build and sales. It’s an approach which has been very successful and popular with their customers.

2.4 Dandara prides itself on providing innovative homes and commercial properties, which would offer real value for money without compromising on design, durability or quality.

2.5 It is Dandara’s aim for their development sites to create:
- Attractive new communities;
- High quality homes;
- High quality working environments;
- Sounds investments; and
- Schemes that minimise the impact on the environment.

Knights Wood, Tunbridge Wells

2.6 Knights Wood is perhaps Dandara’s most well-recognised development in Tunbridge Wells borough and comprises an award-winning development that supports a new community. The site extends some 220 acres and is located on the eastern edge of Royal Tunbridge Wells. Planning permission (LPA ref. 13/02885/OUT) was granted on 27th January 2014 for up to 550 new homes, shops, community spaces and a two-entry primary school. A subsequent application (LPA ref. 18/00602/FULL) was granted on 24th January 2019 for an additional 86 residential units (Phase 4). Phases 1 and 2, including the new primary school, have been delivered to date. The development also includes the long term management of the surrounding Ancient Woodlands.
Dandara secured permission (ref: 16/504331/FULL) for the redevelopment of the Union House office building located at the end of The Pantiles in June 2017. This unattractive office building has now been demolished and the construction of 127 apartments along with office and retail space is currently taking place. The development is of a high quality to reflect its historic location within The Pantiles and includes The Pump House, a not for profit community space, which reflects the historic role of the site as a meeting place for the local community.
3.0 Local Plan Vision and Strategic Objectives

3.1 The Draft Local Plan sets out an overall vision for a prosperous Tunbridge Wells borough, founded on a sustainable growth strategy which is based on an infrastructure-led approach that will largely be funded by development, and is focused on achieving high quality design standards.

3.2 The vision responds to the scale of growth required to meet identified needs. It includes Paddock Wood as a key location for settlement growth (including on land in eastern Capel parish) based on Garden Village\(^1\) principles, using a comprehensive masterplan-led approach. Alongside housing, it is expected to:

- Provide a vibrant and regenerated town centre, together with enhanced employment, leisure, and other facilities;
- Provide significant and strategically planned infrastructure;
- Reduce (existing) flood risk to areas of Paddock Wood, Capel parish, and Five Oak Green.

3.3 Dandara supports the overall vision of the Draft Local Plan and the specific aspirations for the expansion to Paddock Wood and Royal Tunbridge Wells, and also welcomes the focus on sustainable development and achieving high quality design. Dandara also supports the Council’s aspiration for high quality development at other settlements across the borough which responds to the distinctive and particular character of their locations. The combination of strategic and smaller allocations form a critical component of the housing strategy that is capable of being delivered in the short, medium and long term within the Plan period.

3.4 The Council’s ‘Vision and Objectives 2’ strategic objectives include the appropriate release of land from Green Belt. Dandara welcomes the plan-led approach to the release of Green Belt land, though acknowledges that the exceptional circumstances case and evidence to justify amending Green Belt boundaries needs to be robust in accordance with paragraphs 136 – 142 of the NPPF.

3.5 Dandara supports the strategic objectives of the Draft Local Plan, particularly the emphasis on the delivery of new housing to help address the identified housing needs and the disparity between house prices and income in the borough. However, it is suggested some minor modifications are made to strategic objectives to clarify that the plan is positively prepared and fully aligned with the plan-making provisions of Chapter 3 of NPPF.

3.6 Dandara is concerned that the delivery of new homes at Paddock Wood should not be directly linked to and reliant on the potential new settlement at Tudeley Village. Given the complexity and timescales associated with the delivery of garden settlements, it is strongly suggested that the site allocations are separated, with an overarching Strategic Framework or ‘Town Wide Framework’ to be adopted for Paddock Wood and for new infrastructure requirements to be assessed as part of an Infrastructure Delivery Plan (either incorporated into the framework or separate) which enables both allocations to be brought forward independently. Reasons for this are provided throughout these written representations.

3.7 Dandara also welcomes TWBC’s approach to releasing appropriate land from the Green Belt, where there are exceptional circumstances to justify release of the above-mentioned sites for reasons which include the delivery of new housing in sustainable locations, providing new educational facilities, facilitating wider economic growth through a plan-led approach, and

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\(^1\) UK Gov.: Ministry of Housing, Communities and Local Government: Garden Communities Prospectus (August 2018).
increasing public accessibility to it, as well as ensuring development protects the openness of remaining Green Belt land.

3.8 A summary of the exceptional circumstances as set out in TWBC’s Distribution of Development Topic Paper for Draft Local Plan Regulation 18 Consultation (September 2019) for each of the sites Dandara holds a specific land interest in are set out below:

- Paddock Wood: to provide strategic development opportunities; delivery of housing in a sustainable location, infrastructure led improvements and flooding improvement associated with flood risk mitigation measures.
- Spratsbrook Farm: strategic release to deliver secondary school facilities and residential in a sustainable location.

3.9 Dandara considers that the above reasons are in accordance with paragraphs 135 and 136 of the NPPF insofar as these sites demonstrate exceptional circumstances – and therefore sound reasoning – exist to justify the amendments to Green Belt boundaries and release of Green Belt land for housing and new educational facilities.

3.10 Dandara also considers TWBC’s Green Belt Study (Stages 1 and 2) to be a thorough and robust report. The methodology and coverage of the Study are also considered to be sound.

Housing Need

3.11 The Draft Local Plan sets out an Objectively Assessed Need (‘OAN’) for the borough of 678 dwellings per annum (based on the 2014-based population projections using the standard methodology), which over the 20-year Plan period amounts to 13,560 dwellings. Of this housing target, taking into account completions, extant permissions, existing allocations and a windfall allowance, it confirms that additional allocations are needed – as a minimum – to provide 7,593 new homes as set out in Table 1 below:

<table>
<thead>
<tr>
<th>Table 1: TWBC’s Housing Need 2016-2036 (as at 1 April 2019) – Extract from Draft Local Plan (Regulation 18)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Housing need using the standard method (2014 household projections)</td>
</tr>
<tr>
<td>2. Completions April 2016 to March 2019</td>
</tr>
<tr>
<td>3. Extant planning permissions at 1 April 2019</td>
</tr>
<tr>
<td>4. Outstanding site allocations</td>
</tr>
<tr>
<td>5. Windfall allowance</td>
</tr>
<tr>
<td>6. Minimum additional allocations to meet housing need</td>
</tr>
</tbody>
</table>

3.12 It is noted that TWBC’s latest housing target is double the existing Core Strategy target of 300 dwellings per year, and therefore represents a significant challenge in terms of needing to markedly increase housing delivery.

3.13 To ensure delivery of the outstanding requirement for some 12,000 dwellings (as at 1st April 2019), TWBC considers it appropriate to make some allowance for the delay and/or non-delivery of a proportion of the identified sites.

3.14 TWBC considers that the total capacity of all identified sites (outstanding planning permissions, retained Site Allocations, together with new allocations proposed in the Draft Local Plan) provides for 14,776 net additional dwellings (as shown in the Cumulative Housing
Completions 2016/17 to 2035/36 column of TWBC’s housing trajectory. This compares to a minimum requirement of 13,560 dwellings, thereby amounting to an oversupply of 1,216 homes (8.23% not 9% as incorrectly stated in the Draft Local Plan: paragraph 4.162).

3.15 Dandara considers that the OAN should be clearly expressed as minimum target, consistent with paragraph 73 of the NPPF.

3.16 TWBC’s Housing Supply and Trajectory Topic Paper (September 2019), confirms that independent of TWBC recently updating its 5 year housing land supply position (5YHLS) for 2018/19 which identified that the Council, inclusive of a 5% buffer as determined by the Housing Delivery Test, does not have a 5 year housing land supply, but rather 4.69 years.

3.17 In applying the housing delivery test, TWBC has applied a 9% buffer as part of the total delivery target of 14,776 dwellings to be delivered up to 2036. In the interests of managing housing delivery uncertainty, and building in more resilience over time into the new Plan, Dandara suggests that TWBC should build in a larger buffer, closer to 20%, which may be particularly important if there are delays to delivery, not least relating to Tudeley Village as a garden village settlement. This will ensure the Plan has been “positively prepared” and the housing strategy is robust in accordance with Paragraph 35(a) of the NPPF.

3.18 Dandara acknowledges TWBC’s position in terms of its identified housing need, which brings into sharp focus the importance of including new allocated sites in order to contribute to the scale of growth required, in a way that is sustainable. Dandara further emphasises the importance of including a range of sizes and types of allocated sites in the interests of spreading growth throughout the borough, and to ensure continued delivery of housing supply across the Plan period.

3.19 Dandara will support TWBC by promoting their sites in which they hold a land interest for the delivery of new homes to contribute towards meeting their housing targets.

\[ \text{Growth Options} \]

3.20 The Draft Local Plan assesses five growth options as part of formulating the preferred Development Strategy:

- Option 1: Focused growth
- Option 2: Semi-dispersed growth
- Option 3: Dispersed growth
- Option 4: Growth corridor-led approach
- Option 5: New settlement growth

3.21 Based on the 2017 Options Consultation, TWBC recognises that a combination of two or more of the options presented could form the preferred strategy to meet the identified growth required through the new Local Plan.

3.22 TWBC is promoting ‘Option 3’ ‘dispersed growth’ to include site allocations for new housing located at the majority of existing settlements, and ‘Option 5’ a new ‘stand-alone’ garden settlement (Tudeley Village) and the transformational expansion of an existing settlement, using garden settlement principles.

3.23 Option 3 includes the comprehensive expansion of the settlement of Paddock Wood (including land within Capel parish) following garden settlement principles.

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2 Tunbridge Wells Borough Council: Tunbridge Wells Borough Local Plan: Draft Local Plan Regulation 18 Consultation Draft (September 2019) Pg. 35.
3.24 The employment growth needs of the borough are met by a development strategy based on a combination of Option 1 (focused growth), Option 2 (semi-dispersed growth), and Option 4 (growth corridor-led approach).

3.25 Dandara supports the principle of the preferred Development Strategy, which focuses on infrastructure-led development while also addressing the identified OAN. Dandara supports the comprehensive expansion of the settlement of Paddock Wood (including land within Capel parish) as this area is considered to be suitable to support significant growth. Dandara further supports the need for dispersed planned growth through a range of site allocations for deliverable sites that can deliver new homes and be accommodated on the basis that they benefit from the support of existing infrastructure.

3.26 Dandara emphasises the importance of sustainable growth. As set out in these written representations, Dandara is supporting a series of sites which are proposed to be included as allocations for housing delivery. These sites are all allocated for new housing in the emerging Local Plan and are importantly all suitable, available and deliverable in either the short or short to medium term.

3.27 Dandara recognises that planning for strategic scale growth has the potential to make a significant contribution to meeting identified development needs. It is, however, recognised that such strategic growth is reliant on the nature and timing of infrastructure investment which typically has a long lead period, with new homes inevitably being delivered later in the Council’s trajectory.

3.28 In respect to the expansion at Paddock Wood (AL/PW1) and housing delivery at this site, Dandara is concerned that TWBC’s housing trajectory seeks to deliver a high volume of homes (circa 333 homes per annum) relatively early in the Plan period (commencing from 2024/25 onwards until 2035/36). Whilst Dandara supports early delivery at homes at Paddock Wood, they are concerned that the annual delivery of homes forecast is consistently high. Dandara therefore suggests that in the interests of ensuring housing delivery is achievable and realistic, it would be prudent for TWBC to adopt a higher buffer to plan for any delays or underperforming years in their housing trajectory, as part of ensuring they can demonstrate a 5YHLS position.

3.29 As set out in these written representations, Dandara raises concern about the timescales of deliverability of the new garden settlement of Tudeley Village and are cautious of the reliance on this in delivering new housing within the Plan period. Tudeley Village would form an isolated ‘garden village’ and would be reliant on significant infrastructure investment to bring the site forward, as well as resolving other development challenges a scheme of this nature will likely face.

3.30 The suitability and robustness of the Tudeley Village site allocation will depend on (inter alia) reasonable confidence that the required infrastructure investment is feasible and realistic, and importantly is capable of being delivered within reasonable timescales for the Council to rely on it as part of their housing strategy and trajectory. More significantly, however, Dandara is keen to ensure the robustness of the Paddock Wood expansion by structuring this allocation such that it is not reliant on Tudeley Village for the delivery of infrastructure. The proposed allocations may need to be considered in combination, however, both allocations should be deliverable in their own right and provide all infrastructure to meet their own needs.

3.31 In order for the Plan to be robust and satisfy the appropriate policy tests to be found sound, consideration should be given to the appropriate allowance for any possible delays in housing delivery, particularly in relation to large scale strategic sites dependent upon new infrastructure to facilitate growth.
3.32 Dandara supports the approach within the Plan towards supporting more sustainable locations and concentrating growth at existing settlements, through providing urban extensions to existing settlements that benefit from a sustainable location, existing transport links and other social infrastructure, and where new growth can enhance the existing economy. Furthermore, urban extensions allow settlements to develop more organically, and typically have infrastructure capacity (which may be capable of being increased) to support sustainable new growth.

3.33 Dandara supports the allocation of the sites and planned growth at Paddock Wood, Spratsbrook Farm, Sissinghurst and Hawkhurst as part of TWBC’s growth strategy. New development in all these locations would constitute sustainable growth and combined would deliver much need housing and economic growth, whilst taking advantage of good existing infrastructure.

3.34 Accordingly, Dandara suggests TWBC should review their housing trajectory and adjust the strategy to facilitate early delivery of new homes on allocated sites wherever possible, whilst ensuring a robust position to allow for delays in strategic allocations which may require the identification of further sources of supply.

3.35 Dandara supports the overall ambitions of the Regulation 18 Local Plan in terms of responding to the scale of housing growth that needs to be accommodated within the Plan period.

Draft Local Plan Evidence Base

3.36 Dandara supports the Transport Evidence Base in principle, which seeks to promote non-car travel within urban areas and targeted highway capacity interventions on strategic route corridors where required to enhance journey time reliability and highway safety. This approach is fully in line with national planning policy. It is nevertheless clear that further detailed technical work is required in relation to the major infrastructure schemes proposed (e.g. the Colts Hill bypass) to inform the forthcoming Submission Draft Plan, in terms of engineering feasibility, phasing, viability of public transport services etc.

3.37 Dandara also supports the approach taken in the Landscape Sensitivity, Green Belt and Green Infrastructure Evidence Base, subject to the recognition that the site-specific design can deliver recognised benefits and mitigation in these regards (as recognised by the National Planning Practice Guidance (‘NPPG’) in July 2019 in respect of Green Belt) that should be factored into any assessment as a final assessment stage.

3.38 Further assessment will be provided as the Local Plan evolves.

Development Strategy Policies

Draft Local Plan Policy STR1: ‘The Development Strategy’

3.39 Policy STR1 sets out TWBC’s broad development strategy for development within the Plan period. Dandara supports the general borough-wide release of suitable Green Belt land to provide new housing, employment opportunities and social infrastructure.

3.40 In relation to Part 1 of Policy STR1, Dandara supports the planned expansion of the Main Urban Area of Royal Tunbridge Wells and the opportunity to deliver new homes at Spratsbrook Farm, on the south-western periphery of the Town.

3.41 With regard to Part 2 of Policy STR1, comprising the expansion of Paddock Wood, Dandara supports this and welcomes the opportunity for housing and employment growth.

3.42 With regard to Part 3 of Policy STR1, and the proposed new garden settlement at Tudeley Village, as explained above Dandara is concerned about the extent to which it is being relied
upon to contribute to meeting identified development needs within the Plan period, and the
timing of delivery as set out in TWBC’s housing trajectory.

3.43 It is considered that the policy and trajectory in relation to Tudeley Village needs to be robust
and demonstrable of delivery. It may therefore be necessary to amend the yield within the
Plan period as part of ensuring that any allocation for Tudeley Village satisfies the appropriate
policy tests in accordance with paragraph 23 of the NPPF.

3.44 Dandara supports Part 4 of Policy STR1 and the proposed new housing growth and social
infrastructure at Hawkhurst.

3.45 Dandara welcomes Part 5 of Policy STR1 and the proposed growth around Cranbrook itself,
Sissinghurst, and at Hartley.

3.46 Further comments in respect of Policy STR1 are provided in Section 4 within the Site Specific
Representations.

Draft Local Plan Policy STR2: ‘The Presumption in favour of sustainable development’

3.47 Dandara supports the focus of Policy STR2, and TWBC’s desire to deliver sustainable
development and growth that benefits the environment and addresses social impacts. This
policy is considered to be consistent with paragraph 8 of the NPPF, and sound in accordance
with paragraphs 31 and 35 of the NPPF.

Draft Local Plan Policy STR3: ‘Masterplanning and use of Compulsory Purchase
powers’

3.48 Dandara supports the emphasis on masterplanning as set out under Policy STR3. Masterplanning is an assured way of creating well-planned and high quality developments. However, where a strategic allocation encompasses a number of separate sites and separate
ownerships this should be a Strategic Framework which sets the overarching principles of
development, against which separate area or site masterplans can be prepared and
submitted alongside a planning application. It is important to differentiate that a Strategic
Framework is different to a masterplan, with a Strategic Framework being adopted, if
necessary, and a masterplan providing more detail to support a planning application. The
Strategic Framework should provide principles to guide development proposals and
infrastructure delivery but should not seek to replicate the details required by a planning
application. This will ensure a comprehensive and coordinated approach, but not unduly
restrict delivery. Both Strategic Frameworks and masterplans should be clearly defined within
the Plan.

3.49 Dandara will proactively work with TWBC as well as adjacent landowners, developers, the
local community, town or parish councils, service providers, environmental organisations,
and other interested parties where necessary to ensure any overarching Strategic Frameworks
and site masterplans, as appropriate, are comprehensive and achieve the objectives of Policy
STR3.

3.50 In respect of Compulsory Purchase Order (‘CPO’) powers, Dandara welcomes TWBC’s stance
and encourages these to be used more readily where necessary to unlock sites and address
complex land-ownership challenges. The principle of this is consistent with paragraph 119 of
the NPPF.

Draft Local Plan Policy STR4: ‘Green Belt’

3.51 Dandara supports the controlled release of land from the Green Belt through the Draft Local
Plan under Policy STR4, in the interests of delivering much needed housing but only where
exceptional circumstances are fully evidenced and justified in accordance with paragraph
136 of the NPPF. The need to change Green Belt boundaries has to be dealt with through strategic policies within the Draft Local Plan in accordance with paragraphs 135 – 136 of the NPPF.

3.52 Dandara suggests the wording of this policy should reference the need to demonstrate exceptional circumstances and the importance of ensuring development does not cause substantial harm to the openness of retained Green Belt land, to reflect the NPPF.

3.53 Dandara further highlights that TWBC need to be satisfied that any exceptional circumstance evidence is suitably robust to meet the requirements of the NPPF. It is also accepted that all applications affecting the Green Belt must adhere to the specific policy tests set out in the NPPF (paragraphs 133 -147).

Draft Local Plan Policy STR5: ‘Essential Infrastructure and Connectivity’

3.54 Dandara welcomes the intentions of Policy STR5 and the importance of the delivery of necessary infrastructure, services and facilities to serve the needs arising from new development. It is further noted that new infrastructure can positively act as a catalyst for new development. It is suggested, however, that Policy STR5 refers to ‘improvement’ rather than ‘betterment’ to reflect the objectives of STR5, and not to be confused with ‘betterment’ in a land value sense.

3.55 Dandara urges TWBC to ensure that any financial contributions that may be needed, to be secured by way of Section 106, are fair and proportionate to the scale of the proposed development. Furthermore, such moneys must be invested as intended and within set timescales so as not to halt new development, in the interests of delivering new homes and jobs.

3.56 In respect of education and school places, Dandara supports the provision of sufficient school places in the form of expanded or new primary and secondary schools, together with early years and childcare facilities, and acknowledges that new developments should contribute through land and/or contributions towards school provision.

3.57 Dandara is committed to helping to facilitate delivery of a new secondary school at Spratsbrook Farm through the provision of land for Kent County Council to construct the school.

3.58 Dandara further supports the provision of new health, water infrastructure, digital infrastructure and utilities, green, grey and blue infrastructure and cultural infrastructure under Policy STR5.

Draft Local Plan Policy STR6: ‘Transport and Parking’

3.59 Dandara supports the approach to delivering future developments in close proximity to accessible locations and promotion of sustainable transport modes under Draft Policy STR6.

3.60 Dandara welcomes the commitment to developing and providing an integrated strategic cycle network within settlements, particularly Royal Tunbridge Wells, Southborough, Langton Green, Rusthall, Pembridge, Paddock Wood, Five Oak Green, and the new garden settlement at Tudeley Village, but also between these and other settlements.

3.61 Dandara further welcomes the following planned infrastructure improvements:

- Strategic highways network improvements including projects on the A21 Kippings Cross to Lamberhurst, A264 bus priority measures, the Hawkhurst relief road, and the A264 junction capacity improvements (Woodsgate Corner and Halls Hole Road/Blackhurst Lane);
- Provision for the offline A228 as part of the wider strategic transport network;
• Rapid bus/transport links, including from Paddock Wood to Tunbridge Wells; and
• Paddock Wood to Tonbridge (via Tudeley Village), and Tunbridge Wells to Tonbridge,
  and retain and enhance existing bus services.

**Draft Local Plan Policy STR7: ‘Place Shaping and Design’**

3.62 Dandara supports the place-making principles set out under Draft Policy STR7, and the focus
on all new development achieving high standards of design.

**Draft Local Plan Policy STR8: ‘Conserving and enhancing the natural, built, and historic environment’**

3.63 Dandara supports the focus of Draft Policy STR8 in conserving and enhancing the natural,
built and historic environment. Dandara further recognises the importance of the borough’s
natural landscape, its importance in place-making and opportunities for biodiversity
enhancement where possible.

**Draft Local Plan Policy STR9: ‘Neighbourhood Plans’**

3.64 Dandara recognises the importance of local-level plan-making, and the importance of
Neighbourhood Plans (where they are in place) in decision-making. Dandara is committed
to working proactively and collaboratively with local groups, including Neighbourhood
Forums, to ensure new development addresses local needs and local people can participate
in development discussions.

**Draft Local Plan Policy STR10: ‘Limits to Built Development Boundaries’**

3.65 Dandara supports the inclusion of Limits to Built Development and recognises the purpose of
this designation as a means by which to control development. However, Dandara considers
that it is necessary for TWBC to check the existing boundaries, as shown on the Local Plan
Proposal Maps, in order to ensure that they are carefully and accurately drawn up, based on
identified development needs, and on suitable evidence (including up-to-date OS and land
registry data).

3.66 It is also suggested that TWBC build in some flexibility into this policy to allow Limits to Built
Development boundaries to be amended in exceptional circumstances during the Plan
period, in the interests of delivering new homes, for example where performance against 5-
year housing land supply targets is not being achieved.
4.0 Site Specific Representations

4.1 Dandara has specific land interests in the following sites listed below, all of which are proposed as either site allocations or as part of wider site allocations within the Draft Local Plan:

- Badsell Farm, Paddock Wood (‘Paddock Wood’);
- Land to the west edge of Eridge Road at Spratsbrook Farm (Spratsbrook Farm’);
- Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road (‘Sissinghurst’); and
- Land off Copthall Avenue and Highgate Hill, Hawkhurst (‘Hawkhurst’).

4.2 Site location plans for each site are included below.

4.3 All four of the above mentioned sites would contribute significantly to the overall vision of the Plan, particularly in terms of helping to meet the OAN for housing in the borough.

Site Allocation Policies

4.4 Paragraph 16 (Part d) of the NPPF requires Plans to:

“d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”.

4.5 With reference to paragraph 16 of the NPPF, Dandara suggests that TWBC review the length of, and simplify, the wording of their site allocation policies. It is also confusing to have separate, but linked, strategy (STR policies) and allocation (AL policies). Dandara suggests that the strategic policies should be less prescriptive in terms of the level of detail set out. Dandara also considers that it would be more robust and straightforward to have one concise policy for each site allocation.

4.6 For example, the Badsell Farm site is covered within both site allocations Capel (CA3) and Paddock Wood (PW1), which both have separate strategic and site allocation policies (Policies STR/CA1, AL/CA3, STR/PW1 and AL/PW1), rather than one comprehensive policy for each. Whilst it is accepted that the Badsell Farm site lies in Capel rather than Paddock Wood, having two policies that largely replicate each other in respect of this site and cross-reference one another for multiple facets of the policy is unnecessarily confusing. Moreover, Tudeley Village under these strategic policies is also tied to Paddock Wood, but should have a separate strategic policy as it is a separate allocation. This is critical in the interests of not complicating the delivery of new homes and infrastructure.

4.7 In order to meet the requirements of Paragraph 16 (d), this approach should be reconsidered to ensure that the policies for each site allocation are clearly set out in one place.
Badsell Farm, Paddock Wood

4.8 The site is c.45 hectares and is contiguous with the western edge of the settlement of Paddock Wood. It is bound to the east by existing residential areas, to the south by Badsell Road, to the west by the A228 and to the north by an existing railway line in part (nearest the settlement to the east), and existing hedgerows. A Site Location Plan is provided in Figure 2 below.

![Figure 2: Badsell Farm, Paddock Wood Site Location (Indicative Red Line Boundary)](image)

4.9 The site, which Dandara refers to as Badsell Farm, forms part of a wider parcel of land and Draft Local Plan site allocation, known as ‘Land at Capel and Paddock Wood’ (Policy AL/CA 3), as shown in Figure 3 below. The site comprises the majority of land parcel ‘PW1_1’. The north-west section of PW1_1 does not form part of Dandara’s land interest.

4.10 The wider allocation is to be a key source of housing supply and is expected to provide 4,000 new dwellings, employment and associated education, leisure and health facilities. This is anticipated to involve the release of the Badsell Farm site from the Green Belt.

4.11 In respect of the AL/CA 3 development parcels identified in Figure 3 below, parcels PW1_1 – PW1_3 are all proposed to be released from the Metropolitan Green Belt as currently shown on TWBC’s Local Plan 2006 adopted Proposals Map.

4.12 Land at Capel and Paddock Wood (comprising all sites in allocation AL/PW1 and AL/CA3) was assessed as part of the Strategic Housing and Economic Land Availability Assessment (‘SHELAA’) in July 2019. The assessment references the exceptional circumstances test in terms of releasing land from the Green Belt. The exceptional circumstances case, as set out in Distribution of Development Topic Paper for Draft Local Plan Regulation 18 Consultation (September 2019) relates to provision of strategic development opportunities; delivery of
housing in a sustainable location, infrastructure led improvements and flooding betterment associated with flood risk mitigation measures. Dandara supports these reasons, but highlights that TWBC will need to ensure they have a full and robust case and supporting evidence base.

Figure 3: Draft Local Plan (Regulation 18) Map 39 Policy AL/CA3 Extract

4.13 In order to ensure that the site allocation is in accordance with paragraph 35 of the NPPF, which sets out the tests of soundness (positively prepared, justified, effective and consistent with national policy) Dandara has provided the following policy comments in relation to this site.
Draft Local Plan Policy STR/CA1 ‘The Strategy for Capel Parish – Dandara notes the following:

4.14 The strategy for Capel Parish under Draft Policy STR/CA1 advocates a comprehensive masterplan approach and includes Land at Capel and Paddock Wood. Dandara supports the need for a masterplan-led approach, however, considers this should be a Strategic Framework rather than a masterplan as set out within our response to Policy STR3. It is considered that the policy should be amended so as to require a Strategic Framework or Town Wide Framework including an Infrastructure Delivery Plan. This will ensure that both development, design and infrastructure requirements are comprehensively coordinated across the various sites around Paddock Wood and include town centre regeneration.

4.15 This Strategic Framework and Infrastructure Delivery Plan should be coordinated and not separate documents, the objective of both to establish development principles, parameters and infrastructure requirements but not detailed design of each site, which would be the role of a masterplan as part of the planning application process.

4.16 Dandara has not submitted any concept masterplan or any illustrative scheme for Paddock Wood at this stage. This work will be progressed alongside a Town Wide Framework including Infrastructure Delivery Plan, and will be informed by a robust technical evidence base.

4.17 As set out throughout these written representations, Dandara does not consider it necessary for the Paddock Wood and Tudeley Village allocations to be linked, even for infrastructure delivery purposes. Both allocations need to be separate in their own right, with the Framework allowing for a coordinated approach, but one that is not dependant on both allocations coming forward within the same time frames; tying the two sites together is likely to heighten risks around delivery.

4.18 We think this particular risk is avoidable by separating Paddock Wood and Tudeley Village Infrastructure Delivery Plans into distinct separate plans which correspond to two separate allocations. This may require the Infrastructure Delivery Plans to be coordinated in the event both allocations come forward at the same time, or to plan for future requirements to be incorporated. Dandara also suggests the delivery of new infrastructure at Paddock Wood needs to be viability tested, and based on a robust evidence base demonstrating that such infrastructure is required and to be delivered in realistic timescales to encourage and not stagnate growth.

4.19 Specifically, the delivery of Tudeley Village should not fetter the expansion of Paddock Wood, which is available and deliverable sooner in the Plan period.

4.20 In respect of Point 6 of Draft Policy STR/CA1 and the potential provision of an offline A228 strategic link, it is noted that under Draft Policy AL/CA3 there are in fact two options for this; the offline A228 strategic link and link between Tudeley Village and the A228 or Tudeley Village and land at Capel and Paddock Wood (dependent on which approach is considered appropriate). This should also be referenced in Draft Policy STR/CA1.

4.21 Draft Policy STR/CA1 makes reference to the expansion of Mascalls secondary school. Crucially, this policy is not clear whether the expansion of Mascalls secondary school is an alternative or in addition to Tonbridge. Dandara suggests this point is clarified and referenced in the policy wording to ensure robust strategic policies. It is necessary to ensure that the expansion of Paddock Wood is not dependent on the delivery of a school outside of Paddock Wood and it is noted that Policy AL/CA3 refers only to the expansion of Mascalls secondary school in relation to the extension of Paddock Wood allocations including the sites within Capel Parish. This highlights the confusion arising through having a number of policies relating to one site and very detailed strategic policies.
4.22 Furthermore, TWBC should ensure that the delivery of schools associated with the site allocations are not reliant upon one another. School provision associated with the expansion at Paddock Wood needs to be deliverable in its own right.

**Draft Local Plan Policy AL/CA3 ‘Land at Capel and Paddock Wood’ – Dandara notes the following:**

4.23 TWBC has undertaken a Green Belt review: ‘Tunbridge Well Green Belt Study Stage 1 (November 2016) and Stage Two (July 2017)’ as key evidence base to support the emerging Local Plan. As part of this review and as set out in paragraph 4.49 of the Draft Local Plan and TWBC’s Distribution of Development Topic Paper (September 2019), TWBC states that there are exceptional circumstances for the release of Green Belt land. These include reference to strategic development opportunities; delivery of housing in a sustainable location on the edge of Paddock Wood, infrastructure led improvements and flooding betterment associated with flood risk mitigation measures to Tudeley Brook in accordance with paragraph 135 of the NPPF.

4.24 In respect to paragraph 138 of the NPPF, TWBC confirm at paragraph 6.66 of the Distribution of Development Topic Paper (September 2019) that the redrawing of Green Belt boundaries is acceptable in line with the below findings from the Council’s Green Belt Study:

- Where an area of land is to be removed from the Green Belt, all new boundaries have been drawn to be clearly defined, as far as is possible, using physical features that are readily recognisable and likely to be permanent. These have included roads, rail and trackways, field boundaries, and boundaries to Ancient Woodland;
- A number of sites in the Green Belt have been allocated to provide safeguarded land for future educational, medical land and community uses. These sites will remain, in their entirety, within the Green Belt;
- A number of sites in the Green Belt have been allocated to deliver uses that are considered as not being inappropriate use in the Green Belt, with reference to the examples given in para 146 of the NPPF. These sites will remain, in their entirety, within the Green Belt unless the use is part of a wider mixed use scheme;
- A number of sites that it are proposed for release from the Green Belt include a policy requirement to retain and enhance significant landscape buffers along the boundaries, and these buffers are indicated as such on the site plans. This will ensure a long term permanent and strong boundary for the new inner Green Belt (for example, a major road route running alongside the boundary of a site), in some cases more so than is currently the case;
- Where the above approach has resulted in a small area of Green Belt land being enclosed (or almost surrounded enclosed (or almost surrounded) by non-Green Belt land, this small area has Green Belt land, and has also been taken out of the Green Belt to create a smoother and more logical long term boundary.

4.25 Dandara is satisfied that there is a robust exceptional circumstances case to support the release of Green Belt and the inclusion of Paddock Wood as a site allocation.

4.26 Under Policy AL/CA3, TWBC has allocated the wider site allocation (which includes Badsell Farm) (Parcel PW1_1) for approximately 4,000 new homes, employment and associated education, leisure and health facilities.

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3 Tunbridge Wells Borough Council: Tunbridge Wells Borough Local Plan: Draft Local Plan Regulation 18 Consultation Draft (September 2019) Pg. 49.
4.27 Badsell Farm comprises primarily flat agricultural land within the Green Belt and outside but directly adjacent to the settlement boundary of Paddock Wood. The site comprises large open arable farm land with a number of existing hedgerows along the field boundaries. There is an adjacent area of Ancient Woodland to the north-west of the site, and to the south of the site, along Badsell Road, are a number of Grade II Listed Heritage Assets, including Badsell Manor Farmhouse. The site is accessed via the A228 Maidstone Road and Badsell Road.

4.28 The site is predominantly located in Flood Zone 1, but a small, central part of the site is located in Flood Zones 2/3 associated with Tudeley Brook.

4.29 Badsell Farm site is well situated close to Paddock Wood and is an ideal location for a sustainable urban extension. The site is well connected by sustainable transport modes. The site is approximately a 20 minute walk (1 mile), 6 minute cycle or 5 minute bus ride (no. 205 from Foal Hurst Wood bus stop, Badsell Road) to Paddock Wood Town Centre and a 22 minute walk (1.1 miles), 7 minute cycle or 5 minute bus ride (no. 205 from Foal Hurst Wood bus stop, Badsell Road) to Paddock Wood Station.

4.30 By car, the site is approximately a 4 minute drive (1.1 miles) to Paddock Wood Town Centre and approximately a 5 minute drive (1.3 miles) to Paddock Wood Station.

4.31 The site itself is suitable for residential development (as concluded by TWBC in their SHELAA (July 2019)), factoring in its flat topography, sustainable location and good access from the A228 and Badsell Road.

4.32 The Badsell Farm site is available now and can be delivered early as there are no barriers to delivery. The site is the only parcel within the wider strategic allocation that immediately abuts existing residential dwellings located off Maidstone Road, and is not reliant on other sites within the wider allocation to be delivered first.

4.33 The Badsell Farm site has indicative capacity for circa 800 (subject to detailed assessment) new homes based on initial feasibility work undertaken by Dandara taking into account site constraints, including the need to:

(i) Incorporate a suitable landscape buffer to the ancient woodland;
(ii) Address the setting of the Listed Buildings; and
(iii) Deliver appropriate flood mitigation and attenuation.

4.34 Dandara has commissioned Turley Associates to provide initial heritage advice which will ensure any scheme will appropriately protect the appearance and setting of the existing heritage assets located adjacent to the site.

4.35 Dandara has instructed DHA to prepare a flood risk assessment which will locate the most suitable low flood risk areas within the site to develop in line with the sequential test as outlined in paragraph 157 of the NPPF (February 2019).

4.36 The proposed development will also have regard for the Tunbridge Wells Strategic Flood Risk Assessment (SFRA) (July 2019). The SFRA identifies past flooding incidents associated with Tudeley Brook, to the west of Paddock Wood and the potential mitigation for measures to reduce overland flow including the construction of earth bunds and redefining drainage ditches, as well as installing a flow control structure to prevent flow from Tudeley Brook entering the Gravelly Ways Stream.

4.37 Following an initial highway assessment by DHA, it is evident that the site can be readily accessed from Badsell Road without reliance/impact on any other site, and that its vehicular trip generation would have the least impact on the existing settlement given its relationship with the primary road network.
4.38 It is considered preferable to serve Badsell Farm solely from the B2017 Badsell Road and not from the A228 Maidstone Road, given the strategic and high-speed nature of the latter route. Badsell Road is of an appropriate standard to serve the whole site and this approach would support the integration of the development into the wider settlement.

4.39 In respect to Point 9 of Policy AL/CA3, which seeks contributions to the provision of the offline A228 strategic link between Tudeley Village and the A228 or Tudeley Village and land at Capel and Paddock Wood, Dandara disagrees that the expansion of Paddock Wood should contribute to making Tudeley Village a more accessible or sustainable location. but rather focus on and address its own accessibility requirements.

4.40 It is not justified or necessary for Paddock Wood to rely on any strategic improvements to be delivered at Tudeley Village or vice versa, particularly as these developments will come forward at different timescales. Moreover, Tudeley Village requires significant infrastructure investment over longer timeframes and could therefore be prone to delivery delays.

4.41 The Plan and associated strategic and site allocation policies should be drafted to ensure that each growth location is supported by the infrastructure that each requires, and that efforts are made to seek to co-ordinate this as much as possible. However, this should not be dependent on one another. In practical terms given that Paddock Wood is an existing settlement, it would seem sensible to direct infrastructure funding in the short term to facilitate growth in this location, particularly given that road and public transport infrastructure benefits at Paddock Wood will ultimately benefit accessibility to Tudeley Village.

4.42 As stated above, any infrastructure requirements will need to be viability tested with the relevant evidence base justification provided.

4.43 The initial assessment work demonstrates that Badsell Farm has the potential to support the delivery of circa 800 homes. Delivery is not dependent on the wider strategic allocation and as such, the site could make a significant contribution to housing supply either on its own or in conjunction with the wider allocation around Paddock Wood.

4.44 We understand that TWBC’s intention is for a ‘masterplan’ approach which we understand will function more like a Strategic Framework. This will establish infrastructure, phasing and development principles across the strategic extension. This overarching Strategic Framework or Town Wide Framework would not ‘masterplan’ individual sites, but would instead provide a higher level, strategic and overarching framework against which masterplans for individual parcels contained within the strategic extension can be prepared.

4.45 Dandara suggests that the masterplan is renamed and clarified as a Strategic Framework or Town Wide Framework, and reference should be made to the need for an Infrastructure Delivery Plan to ensure growth is supported and not reliant on unplanned infrastructure.

4.46 Dandara notes that allocation AL/CA3 comprises a series of land parcels. Dandara recommends introducing flexibility within the wording of the policy to enable these to come forward separately if, in time, it is clear that some parts of the allocation are delayed. The Strategic Framework and Infrastructure Delivery Plan will ensure that if this happens, the masterplan for each land parcel would be consistent with these and would result in comprehensive development.

4.47 Dandara has not submitted any concept masterplan or any illustrative scheme for Paddock Wood at this stage. This work will be progressed alongside a Strategic Framework or Town Wide Framework including Infrastructure Delivery Plan, and will be informed by a robust technical evidence base.

4.48 Badsell Farm site could be delivered in the short to medium term, but could be commenced from 2023/24 onwards and is therefore capable of delivering a significant proportion of
housing in the five years of the Plan period. This is of particular significance given the scale of growth required for Paddock Wood. Badsell Farm is available with no barriers to development.

4.49 To conclude, Dandara is supportive of promoting growth in and around Paddock Wood, where there is capacity to contribute to the housing targets identified by the OAN, and considers that it is an appropriate location for release of land from the Green Belt. Badsell Farm constitutes a viable site as part of the wider land parcel and on its own (standalone site). The site is available with no barriers to development, it is suitable for residential development and would be of a scale that is deliverable. Dandara considers that the structure of the allocation should be adjusted as described above, to provide for a Strategic or Town Wide Framework with Infrastructure Delivery Plan with suitable flexibility within the policy wording to facilitate delivery of the separate land parcels within the allocation in the future.

Draft Local Plan Policy STR/PW1 ‘The Strategy for Paddock Wood’ - Dandara notes the following:

4.50 The views expressed in parts 4.39 – 4.47 above apply here. Again, it is worth highlighting that it is confusing to have multiple policies (strategic and site allocation policies) that apply to one allocation. It would be more straightforward and appropriate to have one policy per allocation that includes a strategic vision and detailed policy requirements where necessary.

4.51 In respect of Draft Policy STR/PW1, Dandara asks that TWBC clarifies the concept identified in the Masterplanning and Delivery section of the above policy, paragraph 1. This concept states that there will be an overall or strategic masterplan covering the parishes of Capel and Paddock Wood as well as subordinate masterplans, including in relation to Capel and Paddock Wood (Policy AL/PW1).

4.52 As stated previously, Dandara supports TWBC’s plans for an overarching masterplan but considers this should be a Strategic Framework or Town Wide Framework, to include principles and infrastructure for the broad strategic area. It is noted that there should be a requirement for an infrastructure plan that covers Paddock Wood and Tudeley Village (in combination and separate) and a masterplan that shows how all the Paddock Wood individual expansion sites (land parcels) would work i.e. for example connections, links with Tunbridge Wells, flood mitigation, open space, community infrastructure etc.

4.53 Importantly, this approach should not however include the detailed masterplanning of each site (land parcel) as this would add further complexity and conformity issues with the overarching Town Wide Framework.

4.54 In respect to Policy STR/PW1 and the role of the potential supporting Supplementary Planning Documents (SPDs), Dandara understands that any Strategic or Town Wide Framework would constitute an SPD and therefore form key guidance document.

4.55 Dandara is committed to working with TWBC and other stakeholders and the Developer Forum to prepare an overarching Framework and to bring forward an application for Badsell Farm as part of the Council’s planned expansion of Paddock Wood. This will include discussions on the phasing of infrastructure and land parcels.

4.56 As previously stated, the delivery of new homes at Paddock Wood should not be directly linked to and reliant on the potential new settlement at Tudeley Village. Given the complexity associated with the delivery of garden settlements, it is strongly suggested that it is dealt with through a separate site allocation. The delivery of infrastructure at these locations should also not be linked, and instead, separate infrastructure plans should be prepared.
Draft Local Plan Policy AL/PW1 ‘Land at Capel and Paddock Wood’- Dandara notes the following:

4.57 Dandara’s comments on the strategic approach to growth at Paddock Wood are set out above. This section specifically addresses Dandara’s comments in relation to Policy AL/PW1.

4.58 It has been demonstrated that the Badsell Farm site can be delivered in the short to medium term with commencement from 2023/24 (within the five years of the Plan adoption), is not reliant on the delivery of other sites within the wider allocation and has very different timescales for delivery compared to Tudeley Village.

4.59 The expansion of Paddock Wood should take advantage of the town’s sustainable location. The site is located on the periphery of the town, in close proximity to the town centre and benefits from existing infrastructure connections with moderate public transport access. The site is therefore a suitable location for Green Belt release as part of facilitating new strategic growth in accordance with Paragraph 138 of the NPPF.

4.60 In respect of the requirement for an infrastructure plan to be prepared, as detailed above Dandara suggests the delivery of infrastructure at Paddock Wood and Tudeley Village should not be linked, and separate infrastructure plans should be prepared that are site specific but coordinated, to the extent necessary reflecting the timescales associated with the different allocations.

4.61 Furthermore, Paddock Wood should not have to rely on any strategic improvements to be delivered at Tudeley Village or vice versa. This is to reflect the different anticipated timescales for delivery, and particularly the complexity of unlocking Tudeley Village, which will require significant infrastructure investment over longer timeframes compared to Paddock Wood, which benefits from its sustainable location and good existing infrastructure connections. We have described elsewhere within these representations the risk of delay and fettering of each other’s growth potential, and how this could be mitigated.

4.62 In terms of Paddock Wood itself, it is suggested that TWBC modify the wording of Policy AL/PW1 to introduce greater flexibility to enable land parcels within the allocation to come forward separately if parts of the allocation are delayed. The suggested approach of an overarching Framework will ensure that if this happens, each land parcel could come forward and be consistent with infrastructure, phasing and development principles that collectively will ensure comprehensive development. This approach will ensure housing is delivered at the rate the Local Plan and in doing so will add to the resilience and deliverability of the strategy over the Plan period in accordance with the Local Plan soundness tests as set out under paragraph 35 of the NPPF.

4.63 Dandara will work collaboratively with stakeholders and the Developer Forum to support the expansion of Paddock Wood, and to help prepare the overarching Framework which will facilitate growth and allow individual sites to come forward for development.

4.64 Dandara supports the objective of Policy AL/PW1 to prioritise walking, cycling and public transport through the design and layout of the scheme, and recognise the importance of achieving permeability with neighbouring sites and the existing settlement – not least connections to the town centre, railway station and employment area. This will include the incorporation and enhancement of the existing Public Rights of Way through the site.

**Housing Trajectory**

4.65 In TWBC’s Draft Local Plan housing trajectory, the first phase of parcel PW1 for the delivery of 333 homes is due to commence in 2024/25 with circa 333 homes per annum to delivered up to 2035/36. This trajectory assumes a consistent annual delivery of homes across multiple land parcels, but in reality the annual delivery rates are likely to fluctuate as the parcels are...
built out. It is suggested that TWBC review their trajectory for the expansion of Paddock Wood to build in more flexibility to reflect this, including to allow individual parcels to come forward.

4.66 The expansion of Paddock Wood is a key site in the Council’s housing trajectory and is expected to deliver 4,000 homes. Given the importance of this site to meeting identified development needs, Dandara considers that TWBC should include a buffer closer to 20% to plan appropriately for any delays or underperforming years in their housing trajectory, as part of ensuring they can demonstrate a 5YHLS position.

4.67 The more detailed work to be undertaken in dialogue with TWBC and the Developer Forum will help to feed into and inform the trajectory, in order to ensure that it is accurate, robust and reliable.

4.68 In respect of the Badsell Farm site, this is capable of delivering circa 800 new homes and therefore is a key site (parcel) as part of the wider expansion of Paddock Wood. Dandara suggests the site is capable of delivering 70 dwellings per annum commencing from 2023/24 onwards, i.e. commencing within the first 5 years of the Plan period.

4.69 The site benefits from existing good access off Badsell Road without reliance/impact on any other site and without the need for significant infrastructure to be delivered to facilitate development. Therefore, this site can be delivered earlier in the process.

4.70 The site is therefore suitable for housing, available and deliverable within the short to medium term.

**Land to the west edge of Eridge Road at Spratsbrook Farm**

4.71 The site comprises undeveloped, managed agricultural land, that is located adjacent to Royal Tunbridge Wells. It is bound to the north and east by a mix of residential, commercial and educational uses. The southern allocation boundary forms the TWBC/Wealden District Council administrative boundary. The boundary forms an arbitrary line through the large field it runs through and is not recognisable by a hedgerow, Public Right of Way, etc.

4.72 Dandara controls further land to the south of the allocation boundary within Wealden DC and has promoted (and continues to do so) these land parcels through the emerging Wealden Local Plan. These further land parcels are considered by Dandara to be suitable and available for development and, whilst supporting the TWBC allocation for the site, Dandara considers that the allocation should recognise the potential for future development (including infrastructure linkages) within the Wealden DC parcels. A Site Location Plan is included in Figure 4 below.
4.73 The site (site ref. RTW18) is allocated for release from the Green Belt in the Draft Local Plan to facilitate the development of approximately 270 dwellings and a seven-form entry secondary school. The implementation of this development will require associated infrastructure and transport works.
4.74 Land to the west of Eridge Road at Spratsbrook Farm was assessed as part of the Strategic Housing and Economic Land Availability Assessment in July 2019. The assessment concluded that the site is a sustainable location for development, given the adjacent urban area and its close proximity to the A26 Eridge Road. In addition, the assessment noted the availability of the site, the benefit of it being in single ownership and that it is deliverable within the Plan period. Dandara supports this assessment, the allocation of the site and the vision for its development.

4.75 In order to ensure that the site allocation is in accordance with the NPPF (paragraph 35) tests of soundness; positively prepared, justified, effective and consistent with national policy Dandara provides the following comments in relation to this site:
Policy AL/RTW18 ‘Land to the west of Eridge Road at Spratsbrook Farm’- Dandara notes the following:

4.76 In the adopted Development Plan for TWBC, the Land to the west of Eridge Road site is within the Green Belt. The western portion of the site is within the High Weald Area of Outstanding Natural Beauty (AONB).

4.77 The site is adjacent to the current Limits to Built Development of Royal Tunbridge Wells, to the north and east. There is a Schedule Ancient Monument abutting and within the western part of the site. Close to the north-western and northern boundary of the site is the Eridge Railway Line. There is a listed building (Ramslye Old Farmhouse) adjacent to the site, to the south which connects to the A26 Eridge Road via a track.

4.78 The site is well situated close to the Ramslye neighbourhood to the south west of Tunbridge Wells and is an ideal location for a sustainable urban extension. The site itself is suitable for residential development (as concluded by TWBC in their SHELAA (July 2019), factoring in its relatively flat topography, sustainable location and good access from the A26 Eridge Road. Furthermore, the site is located in a Flood Zone 1.

4.79 The site is located in a sustainable location on the edge of Royal Tunbridge Wells and is accessible by range of sustainable transport modes including approximately a 15/20 minute walk, 7 minute cycle or 5 minute bus journey Sainsbury’s and The Pantiles beyond. By car, the site is approximately a 4 minute drive to The Pantiles (1.1 miles), 4 minute drive to Royal Tunbridge Wells Railway Station (1.3 miles). The site is served by a number of bus stops along Eridge Road.

4.80 TWBC has undertaken a Green Belt review: ‘Tunbridge Well Green Belt Study Stage 1 (November 2016) and Stage Two (July 2017) as key evidence base to support the emerging Local Plan. As part of this review and as set out in paragraph 4.49 of the Draft Local Plan and TWBC’s Distribution of Development Topic Paper (September 2019) TWBC considers that there are exceptional circumstances for the release of Green Belt land associated with the delivery of a secondary school and new homes in a sustainable location in accordance with paragraph 135 of the NPPF. Dandara supports this.

4.81 Identified growth at Spratsbrook Farm will therefore benefit further from the site’s existing accessibility and good public transport connections to Royal Tunbridge Wells. The site also does not require significant infrastructure investment to facilitate the delivery of new homes. The site is available now and can be delivered early as there are no barriers to delivery.

4.82 Under Policy AL/RTW18 the site is allocated for approximately 270 dwellings and a seven-form entry secondary school. Dandara supports this allocation.

4.83 The site has capacity for circa 250 – 300 new homes and a new school based on initial feasibility work undertaken by Dandara and consideration for the site’s constraints, particularly its landscape sensitivity and surrounding heritage sensitivity.

4.84 Dandara has commissioned Turley Associates to provide initial heritage advice which will help ensure any scheme will protect the appearance and setting of the existing heritage assets which surround the site.

4.85 Initial engagement has been undertaken with Kent County Council Highways and Transportation regarding the access strategy for the site, which has been accepted in principle.

4.86 Dandara supports the objective of promoting non-car access between the site and the town centre, including through the incorporation and enhancement of the existing Public Rights of Way network and contributions to a holistic package of sustainable transport mitigation measures for the urban area.
4.87 Dandara has also commissioned DHA to provide an assessment of transport and flood risk issues to ensure these matters are considered early, inform the design and scheme layout and are not a constraint to development.

4.88 In respect of the final paragraph, point B of Policy AL/RTW18, we note that the list of contributions that may be required includes secondary school contributions. As the site allocation includes the provision of a seven-form entry secondary school, Dandara proposes that this be amended to primary school contributions only.

4.89 All such contributions should be necessary to make the development acceptable in planning terms, be directly related, and fairly and reasonably related in scale and kind. All infrastructure requirements will need to be viability tested and provision justified in order to meet the relevant tests.

4.90 Dandara welcomes the need for new school places and to seek investment in local schools in response to the anticipated level of housing growth, and to ensure its delivery as part of a holistic new community.

4.91 Point 7 of the policy requires investigation of the provision of soft landscaping buffer along the south-western boundary with (in) Wealden District Council. As addressed earlier, we consider that the policy (and appropriate clause) should be amended to recognise the ability for future development within Wealden DC as well as associated infrastructure. This is considered to be important having regard to a potential uplift in housing needs/securing a higher buffer in the Local Plan, as well as to ensure appropriate delivery in the Housing Market Area through Duty to Cooperate. This is particularly important given Tunbridge Wells’ status as the regional town serving the needs of a number of authority areas. We would therefore propose the following clause be inserted:

“Provision for appropriate linkages including development and associated infrastructure within land to the south (within Wealden District Council) is recognised and to allow for potential future development”.

Housing Trajectory

4.92 In TWBC’s Draft Local Plan housing trajectory, the first phase of parcel RTW18 for the delivery of 70 homes is due to commence in 2024/25. 70 homes per annum will be delivered between 2024/25 – 2026/27 with 60 homes to be delivered in the final phase in 2027/28.

4.93 In transport terms, the site benefits from ready access to the A26 Eridge Road and the wider Tunbridge Wells urban area, with strong opportunities to promote non-car travel amongst residents, staff and pupils. As such, it does not require significant enabling highways infrastructure which could allow delivery of this site to come forward sooner.

4.94 The site is suitable for housing, available and deliverable within the first 5 years of the Plan period. Dandara suggests TWBC’s trajectory should be adjusted slightly to facilitate the earlier delivery of Spratsbrook Farm, commencing in 2023/2024.

Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road

4.95 The site comprises undeveloped land, in close proximity to the existing Sissinghurst Limits to Built Development. The site is adjoined by residential properties to the north and west, Sissinghurst Road (the A262) runs along its southern boundary, beyond which lies fields, and Mill Lane (narrow, with no pavement) runs along its eastern boundary, beyond which lies residential properties and fields including Sissinghurst Court Historic Park and Garden to the south-east. Access is currently via an existing field gate in the south-east corner of the site. A Site Location Plan is included in Figure 5 below.
The site (site ref. CRS13) is allocated for residential development for approximately 40 dwellings. The development of the site will require highways assessment and works, in terms of access.

In the current Development Plan, the site borders the Limits to Built Development of Sissinghurst to the north and east. There is a Tree Preservation Order (TPO) along the part of the western boundary of the site. The site is located opposite (opposite side of A262) the High Weald Area of Outstanding Natural Beauty (AONB).
It is noted that Land to the east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road, Sissinghurst, was assessed as part of the Strategic Housing and Economic Land Availability Assessment in July 2019. The assessment concluded that the site is likely to be sustainable, due to its proximity to the Limits to Built Development and adjoining existing built development. The assessment also noted the availability of the site and its ability to be delivered within the Plan period.

Dandara supports the allocation of this site, in respect of which it submitted a planning application in February 2019 which is currently pending consideration (LPA ref. 19/00308/FULL) for:
“Development of land to the west of Mill Lane and north of Sissinghurst Road, Sissinghurst to provide 44 new dwellings, including affordable homes, alongside car parking, cycle parking, drainage, internal road network and the creation of a principal access off Sissinghurst Road (A262) alongside public open space, including a play area, and associated landscaping”.

4.100 The proposed scheme will deliver a mix of market and affordable homes as part of the comprehensive development of the site including new access, parking and landscaping. The provision of circa 40 new homes is based on robust viability testing and consideration for the site’s constraints.

4.101 Based on the technical findings, Dandara considers the proposed delivery of circa 40 homes to represent efficient use of land and is policy compliant. Moreover, the provision of circa 40 units is consistent with TWBC’s aspiration for the site as set out in the draft site allocation / Draft Policy AL/CRS13.

4.102 In order to ensure that the site allocation is in accordance with the NPPF (paragraph 35) tests of soundness; positively prepared, justified, effective and consistent with national policy Dandara have provide the following comments in relation to this site:

4.103 Under Policy AL/CRS13 the site is allocated for residential development for approximately 40 dwellings. Dandara supports this allocation.

4.104 The pending application (LPA ref. 19/00308/FULL) presents a detailed and robust planning case for the development of this site. In summary, this undeveloped site is located in a prominent and sustainable location off the A262 Sissinghurst Road with the opportunity for direct access off the A262 and/or Mill Lane. The site is flat in topography and is located in Flood Zone 1.

4.105 The site is therefore suitable for housing, would constitute appropriate infill development, and would be a suitable and sustainable extension to Sissinghurst.

4.106 The site is available. The development of circa 40 homes is of an appropriate scale and will not pose any delivery challenges.

Policy AL/CRS 13 Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road - Dandara notes the following:

4.107 Dandara supports the inclusion of site allocation AL/CRS13 in the Draft Local Plan and promotion for housing. The site is suitable for housing, available and deliverable within the first 5 years of the Plan period.

4.108 Dandara makes the following comments in respect to the detailed wording of Policy AL/CRS 13:

4.109 In relation to paragraph 5 of Policy AL/CRS13, this requires that the development of the site includes improvements to the road junction with Mill Lane and Sissinghurst Road, including exploring opportunities to improve visibility from Mill Lane across the corner of the site, with minimal loss of boundary features. Dandara is seeking clarification as to how this would be funded. For example, would be considered as part of the site allocation development, or will it be included in the highways works in the contributions expected (Policy AL/CRS 13: paragraph 8b).

4.110 This clarification is required to ensure that the allocation is positively prepared (NPPF paragraph 35) and the vision for its development can be fulfilled.

4.111 The red line indicating the proposed site allocation policy boundaries appears to include land belonging to an adjacent residential property (on the western side of the site). Dandara suggest TWBC redraw the policy allocation based on up to date land registry data to ensure the effectiveness of the allocation (required under NPPF paragraph 35).
4.112 Dandara supports growth at Sissinghurst and allocation AL/CRS13. This section specifically addresses Dandara’s comments in relation to Policy STR/CRS1.

4.113 In respect to paragraph 3 of Policy STR/CRS1, this paragraph requires that all development proposals establish the impact of the relevant proposed development on the Hawkhurst and Flimwell crossroads (junction of A21 and A268).

4.114 In relation to Section 11, final paragraph of Policy STR/CRS1, Dandara supports the extension of the Limits to Built Development in relation to AL/CRS13, the allocation for Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road. Dandara notes that this is a part extension, which excludes the southern portion of the site (which is subject to a TPO).

4.115 Dandara requests clarification as to how this part extension interacts with the access and junction requirements of the allocation (Policy AL/CRS13 paragraphs 1-5). This clarification is required to ensure that the allocation is positively prepared (NPPF paragraph 35) and the vision for its development can be fulfilled.

**Housing Trajectory**

4.116 In TWBC’s Draft Local Plan housing trajectory, the parcel CRS13 will be delivered in one phase commencing in 2025/26.

4.117 The site is suitable for housing, available and deliverable now. Should planning permission be granted for the current application (LPA ref. 19/00308/FULL), circa 40 new homes could be delivered as soon as 2021/22. Dandara therefore request that TWBC’s housing trajectory is revised accordingly.
Land off Copthall Avenue and Highgate Hill, Hawkhurst

4.118 The site is comprised of fields and wooded areas, located to the south of Highgate. The site is adjoined to the north and west by residential properties, and to the east and south by fields and paddocks. In terms of access, the site includes a dwelling on Copthall Avenue, and a secondary access to Highgate Hill. A Site Location Plan is included in Figure 7 below.

Figure 7: Land off Copthall Avenue and Highgate Hill, Hawkhurst Site Location (Indicative Site Boundary)
4.119 The site (site ref. HA6) is allocated for residential development, for approximately 70-79 dwellings, as well as areas of publicly accessible open space. The implementation of this development will require assessments in relation to highways impact.

4.120 Land to the west off Copthall Avenue and Highgate Hill, Hawkhurst was assessed as part of the Strategic Housing and Economic Land Availability Assessment in July 2019. The assessment concluded that the site is a sustainable location for development, given it is located within/mostly adjacent to the Limits to Built Development and there is a pedestrian access to the centre of Hawkhurst. In addition, the assessment noted the availability of the site and that it is deliverable within the Plan period. Dandara supports the findings of this assessment and the proposed site allocation.
4.121 The site comprises primarily flat agricultural land, located in Flood Zone 1 and within the High Weald AONB. The site is well situated close to Hawkhurst and is an ideal location for a sustainable extension. The site itself is suitable for residential development (as concluded by TWBC in their SHELAA (July 2019), factoring in its flat topography, sustainable location and good access off Highgate Hill.

4.122 Hawkhurst is identified as a rural service centre as part of the proposed settlement hierarchy in the Draft Local Plan (Policy ED8). New development is directed to primary regional town centres (Royal Tunbridge Wells) first, then town centres before rural service centres. Hawkhurst as a key service centre is identified in the Draft Local Plan (paragraph 6.48) as being suitable for the main focus of town and rural centre uses (existing and future), the existing character and form of development, the visual, physical, and functional relationship between areas, and the potential for appropriate development opportunities.

4.123 It is further noted that in TWBC’s growth options, Options 1 and 2 place significant onus on Hawkhurst for new growth. Hawkhurst is considered to be spatially appropriate in respect to the settlement hierarchy identified above, and a suitable, accessible and sustainable location for growth.

4.124 The site is available now and can be delivered early as there are no barriers to delivery.

4.125 Dandara is promoting the site for residential development and is currently undertaking further site capacity and feasibility analysis at this stage. Dandara made an application in March 2018 (LPA ref. 18/01063/FULL) affecting part of the allocation for:

“Demolition of a 1no. dwelling house and agricultural storage barn to the rear and erection of 49no. dwellings including car parking, cycle parking, sustainable drainage, internal road network and the creation of a new access with associated landscaping”.

4.126 A site location extract is shown below in Figure 9 and confirms that the application comprises the majority of land within site allocation AL/HA 6.

![Site Location Plan Extract For Planning Application LPA ref. 18/01063/FULL](image)

Figure 9: Site Location Plan Extract For Planning Application LPA ref. 18/01063/FULL

4.127 This application was refused in April 2019 despite an Officer recommendation for approval. The scheme was refused by Members at committee for one sole reason based on highway grounds despite KCC Highways Authority agreement that the proposed access was acceptable:
“1. The access arrangements and highway mitigation for the proposed development would amount to poor design that would equate to harm to the area and the way it functions contrary to paragraph 130 of the National Planning Policy Framework 2019”.

4.128 An appeal has subsequently been submitted; Dandara’s appeal case demonstrates that the proposed access arrangements and highways mitigation are appropriate, and highlights that there was no objection from KCC Highways Authority. It should be noted that the proposed access to the site allocation is different to the proposed access arrangements subject of the above appeal.

4.129 In terms of the impact on the AONB, this too has been considered through the planning application. In accordance with paragraph 172 of the NPPF, significant weight should be placed on conserving and enhancing protected landscapes including the AONB and requires applications to meet the below tests:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

4.130 In relation to the site’s location within the High Weald AONB, it is noted in respect to planning application LPA ref. 18/1063/FULL that the proposed layout and design was deemed acceptable as set out at paragraph 10.53 of the Committee Report:

“the design and layout of the scheme is considered to be well thought through and evidenced by assessments of the locality and the characteristics of the site. It is considered that this would achieve a high quality appearance and character to the scheme which is fundamental within this AONB location and raising the bar in terms of new development delivered within the sensitive landscape of the AONB.”

4.131 It was further confirmed at paragraph of 10.81 of the Committee Report that “the Council’s Landscape and Biodiversity Officer considers this scheme to be an exemplary one that may provide a benchmark for others who wish to develop in the High Weald AONB”.

4.132 More recently, an application for the remaining part of allocation AL/HA6 (remaining area to the north) was made by Leander Homes in May 2019 (LPA ref. 19/01253/FULL) which is currently pending consideration and comprises:

“Erection of 31No. residential dwellings and the retention of existing Westfield property. Provision of altered access on to Highgate Hill, associated hard and soft landscaping, retained woodland area and sustainable urban drainage systems (SUDS)”.

4.133 In order to ensure that the site allocation is in accordance with the NPPF (paragraph 35) tests of soundness; positively prepared, justified, effective and consistent with national policy Dandara have provide the following comments in relation to this site:

**Policy STR/HA1: ‘The Strategy for Hawkhurst Parish’ - Dandara notes the following:**

4.134 Dandara supports growth at Hawkhurst as a sustainable location in the settlement hierarchy and allocation AL/HA6. This section specifically addresses Dandara’s comments in relation to Policy STR/HA1.

4.135 Paragraph 3 of Policy STR/HA1 states that for developments expected to be delivered before the Hawkhurst relief road is fully operational, the applicant will be required to demonstrate with clear evidence that there is sufficient capacity at the Hawkhurst crossroads (junction of A229 and A268) to serve the proposed development.
4.136 In reference to planning application LPA ref. 18/1063/FULL, it is noted that the application was refused for access reasons despite KCC Highways Authority confirming that the impact on the highway was acceptable. Dandara suggests further clarity is required in assessing the highway impact of development.

4.137 The timescales for the implementation of the relief road need to be clarified in order to ensure that the strategy for the Parish and relevant allocations are positively prepared, justified and effective under NPPF paragraph 35.

4.138 Dandara emphasises the importance of supporting transport infrastructure as a catalyst for new development. New transport infrastructure should be delivered to strict and realistic timescales in order to facilitate, not prevent, development.

**Policy AL/HA6: ‘Land off Copthall Avenue and Highgate Hill’ - Dandara notes the following:**

4.139 Dandara supports growth at Hawkhurst and the wider development strategy. This section specifically addresses Dandara’s comments in relation to the policy allocation – AL/HA6.

4.140 Paragraph 5.98 of Draft Policy AL/HA6 states that part of the site was subject to a planning application LPA ref. 18/01063 for residential development (which was refused due to design concerns related to the vehicular access onto Copthall Avenue, see above). The more northerly part of the site is subject to planning application LPA ref. 19/01253. This application will be determined on its own merits, and the proposed allocation of this site as part of a larger/wider sites does not indicate any conclusions on the current application.

4.141 Considering the importance of this site, adjacent to the Limits to Built Development of the settlement, its suitability and its role in contributing to the housing targets of the borough we consider that there should be more flexibility built into this policy to allow separate parcels to come forward independently, provided it does not prevent or delay the other land parcels coming forward. Dandara, like TWBC, is concerned by potential piecemeal development and will seek to engage and work collaboratively with all landowners, but the policy should allow flexibility for delivery.

**Housing Trajectory**

4.142 In TWBC’s Draft Local Plan housing trajectory, the first phase of parcel HA6 for the delivery of 44 homes is due to commence in the final year (2023/24) of the first five years of the Plan period. 31 homes will be delivered in the second (final phase) in 2024/2025.  It is, however, likely that the site could be delivered sooner than this as there are no barriers preventing it coming forward sooner.

4.143 The site is suitable for housing, available and deliverable within the short term i.e. within the first 5 years of the Plan period. Dandara therefore supports TWBC’s housing trajectory for the delivery of homes on this site.

**CLIENT’S EVIDENCE BASE**

4.144 In addition to the technical information that has been prepared to-date, Dandara is currently undertaking the following technical studies as set out above:

- Landscape, Visual and Green Belt Appraisal for Badsell Farm, Paddock Wood and Land to the west edge of Eridge Road at Spratsbrook Farm sites; and
- Initial heritage advice in respect to Badsell Farm, Paddock Wood and Land to the west edge of Eridge Road at Spratsbrook Farm sites.
5.0 Development Management Policies

5.1 Dandara has reviewed the Draft Local Plan Development Management Policies to ensure they are consistent with the NPPF. Please refer to the Policy Review Matrix included at Appendix A.
6.0 Summary

6.1 Dandara supports the overall strategic objectives of the Council’s Regulation 18 Draft Local Plan and in particular the focus on the delivery of new homes in the borough. It is evident that TWBC has to identify additional suitable sites for housing, including suitable release of Green Belt land through its new Local Plan if it is to satisfy its OAN and meet its housing target of 678 dwellings per year (more than double the current target of 300 dwellings per year).

6.2 Dandara has land interests in the below sites which are identified as site allocations for significant new growth and primarily the delivery of new homes in the Draft Local Plan:

- Badsell Farm, Paddock Wood (‘Paddock Wood’);
- Land to the west edge of Eridge Road at Spratsbrook Farm (‘Spratsbrook Farm’);
- Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road (‘Sissinghurst Road’); and
- Land off Copthall Avenue and Highgate Hill, Hawkhurst (‘Hawkhurst’).

6.3 The above site allocations all constitute suitable sites for housing and are all available and deliverable now. It is suggested that the above sites at Spratsbrook, Sissinghurst and Hawkhurst are all deliverable in the short term and within the first five years of the Plan period. Given the scale of the proposed residential development at Badsell Farm, this site would be deliverable in the short-medium term.

6.4 Although the Draft Local Plan is at relatively early stage (Regulation 18) in the Local Plan process, Dandara has already been actively engaging with TWBC, in the promotion of the strategic extension to Paddock Wood and in the allocation the above-mentioned sites at Spratsbrook, Sissinghurst and Hawkhurst.

6.5 Dandara has also been working to collate their own evidence base for the above mentioned sites in order to further demonstrate their suitability for housing and to assist with the Local Plan process.

6.6 Dandara will also sustain their collaborative approach by continuing to engage with TWBC as well as key stakeholders, to feed into and inform later stages in the plan-making process.

6.7 Dandara will continue to monitor the progress of the emerging Local Plan and will also look to make written representations on the next stage (Regulation 19) of the Draft Local Plan.

6.8 We would be grateful for confirmation that these representations have been received, and that they have been registered as duly made. We trust this submission is clear and helpful but should there be any queries please let us know.
APPENDICES
A. Development Management Plan Policy Review Matrix
<table>
<thead>
<tr>
<th>Development Management Policies</th>
<th>Dandara Comment</th>
<th>Suggested Policy Amendment(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EN1 Design and other development management criteria</strong></td>
<td>The intention of the policy in seeking to control design quality is supported. However, the policy is very detailed and too long. It is suggested this policy could be simplified and perhaps the key questions / checks kept as supporting guidance text rather than the main body of the policy itself.</td>
<td>Policy should be simplified as per our comments.</td>
</tr>
<tr>
<td><strong>EN2 Sustainable design and construction</strong></td>
<td>Dandara support the policy’s emphasis on sustainable design and construction. Whilst it is accepted that Construction Environmental Management Plans can help mitigate against large scale development impacts, it is suggested that a draft version is submitted in support of major applications (over 20 units or 2,000 sq.m) as full construction delivery details may not be available at application stage and will need to be finalised / amended post decision stage; i.e. discharge of planning condition. It is also suggested this policy could be simplified and shortened in length as it is very detailed.</td>
<td>Policy should be simplified as per our comments.</td>
</tr>
<tr>
<td><strong>EN3 Sustainable design standards</strong></td>
<td>Dandara support the policy’s emphasis on achieving high sustainable design standards. However, further information is required on Home Quality Marks (HQMs) and any inclusion needs to ensure that it is not a duplication of Building Regulations.</td>
<td>No revised wording proposed. Further clarification required.</td>
</tr>
<tr>
<td><strong>EN4 Energy reduction in new buildings</strong></td>
<td>Dandara support the premise of the policy in reducing energy reductions in new buildings and promoting zero carbon and low emission development. However, Dandara requires further details on HQMs and to ensure these are not a duplication of Building Regulations.</td>
<td>No revised wording proposed. Further clarification required.</td>
</tr>
<tr>
<td><strong>EN6 Historic environment</strong></td>
<td>Dandara support the intentions of the policy to protect the historic environment. The policy could be clearer in respect to what is covered by ‘historic environment’ i.e. heritage assets, conservation areas etc.</td>
<td>Policy should be more explicit.</td>
</tr>
<tr>
<td><strong>EN11 Net gains in biodiversity</strong></td>
<td>Dandara support the policy and the wording allows for flexibility.</td>
<td>No revised wording proposed.</td>
</tr>
<tr>
<td><strong>EN13 Ashdown Forest SPA</strong></td>
<td>Dandara support the Policy in that it allows for sites to be considered on a case by case basis.</td>
<td>No revised wording proposed.</td>
</tr>
<tr>
<td><strong>EN14 Trees, Woodlands, Hedges, and Development</strong></td>
<td>Dandara support the general intentions of the policy to protect trees, woodlands and hedges. Dandara support the general presumption in favour of tree retention but suggest tree removal should be acceptable in principle when there is net gain in trees and/or enhancement in soft landscaping.</td>
<td>No revised wording proposed. Policy should be more explicit.</td>
</tr>
</tbody>
</table>
| **EN20 Rural Landscape** | Dandara support the principle of the policy but consider amendments are needed to ensure that it does not result in a blanket reason to refusal otherwise sustainable greenfield development. | Suggested policy wording: *Development will be required to:*
1. Conserve and enhance the unique and diverse variety and juxtaposition of the borough’s landscape and the special features that contribute positively to the local sense of place; and
2. **Not cause include appropriate mitigation to ensure against** significant harm to the landscape setting of settlements, including historic farmsteads and hamlets; and
3. Not result in unsympathetic change to the character of a rural lane, which is of landscape, amenity, nature conservation, or historic or archaeological importance; and
4. **Restore enhance** landscape character where it has been eroded; and
5. Preserve intrinsically dark landscapes in accordance with Policy EN10: Outdoor Lighting and Dark Skies. |
| **EN23 Air Quality** | Dandara support the policy’s emphasis on sustainable design and construction. The Policy requires for small scale mitigation measures such as electric vehicle charging and for developments to be air quality neutral. We would support a policy which allows for negotiation with the Council in terms of level of provision and offsetting. | No revised wording proposed. |
| **EN27 Conservation of Water Resources** | Dandara supports the conservation of water resources and are satisfied with the proposed maximum water consumption rates. | No revised wording proposed. |
| **EN29 Sustainable Drainage** | Dandara support the promotion of sustainable drainage. It is suggested a caveat is used for the conversion or change of use existing buildings where it is not feasible to provide SUDs / alter existing volume of hardstanding. | No revised wording proposed. |
| **H1 Implementation of planning permission for new residential dwellings** | Dandara recognises the importance of delivering approved housing schemes but suggest a period of 3 years from the date of decision is more appropriate and reasonable to allow sufficient time to implement the permission. | Suggested policy wording: *Unless there are exceptional circumstances due to specific site or development constraints, a condition will be attached to any grant of planning permission for new major residential development (including change of use) requiring one or the other of the following conditions:*
1. That the permission be implemented within three years from the date of decision, or |
### H2 Multi-developer delivery and piecemeal development of larger sites

Dandara understands the promotion of multi-developer delivery on larger major and strategic sites and the need to protect such sites from ‘piecemeal’ development. Dandara is committed to working with adjoining landowners and the Council to ensure comprehensive development on larger major and strategic multi-developer sites. Whilst the policy does allow for development to in some circumstances, greater flexibility should be incorporated into it to ensure that development is not unduly delayed. As suggested in the amends to the PW/CA policies – Frameworks should be used to set principles to enable individual developments to come forward without being dependant on others.

**Proposed amendments required in response to comments.**

Policy to be revised to include more flexibility.

### H3 Housing Mix

Dandara supports the requirement for a range of house sizes and types.

No revised wording proposed.

### H4 Housing Density

Dandara support the principle of developments being proposed to an appropriate density for the site’s surrounding but suggest it should place greater emphasis on existing sustainable locations that benefit from existing infrastructure.

Suggested policy wording:

- Development shall be delivered to an appropriately high density having regard to its context, including landscape, topography, surrounding built form, site accessibility and existing transport infrastructure and any other relevant factors.

Planning applications will be refused where development is found not to make efficient use of land.

### H5 Affordable Housing

Dandara support the Council’s approach to affordable housing and are committed to the delivery of affordable housing. Dandara support the proposed tenure split of 60/40, however flexibility will be required to respond to specific sites and this should be reflected in the wording of the policy.

Dandara suggest the following policy amendments:

- The overall proportion of affordable housing needs to be viability tested, particularly in respect of the strategic allocations where it is stated proportion has not yet been determined.
- The timing of delivery under point 3 should be removed as this clearly may not be possible in all developments and such restrictive approach may result in delays to the delivery of development.
- The timing of delivery of affordable housing should be site specific.
- The policy should also set out specific requirements in terms of a percentage for the M4(3) standards.

Proposed amendments required in response to comments.

### H9 Housing for Older People

Suggests that housing suitable for meeting the needs of older people should be integrated into major developments. This however this policy is too vague and needs further clarity on what this means.

No revised wording proposed. Further clarification required.

### H11 Self Build

Policy should be amended so as to allow for developments to meet identified Self Build Register requirements (capped at 5%) rather than require a blanket 5% on all developments over 100 units. The requirement to subsequently offer the plot to the Council/RP should be removed as this is not effectively self build.

Suggested policy wording:

- Where a need has been identified for self-build and custom housebuilding plots in the parish or settlement by the Self-Build and Custom Housebuilding Register, plots for such development will need to be provided:
  1. On sites proposing to deliver (or capable of delivering) 100 or more residential units, self-build or custom housebuilding plots will be required, comprising of at least 5% of the total number of units being proposed. The resulting number of self build units required to be provided will be required to be rounded up to the nearest whole number. This is in addition to the level of affordable housing required by Policy H 5: Affordable Housing.
  2. Up to a maximum 5% self build units. The resulting number of self build units required to be provided will be required to be rounded up to the nearest whole number. This is in addition to the level of affordable housing required by Policy H 5: Affordable Housing.

Once planning permission has been granted, the self-build and custom housebuilding plots will need to be marketed through relevant trade organisations for at least a year. Evidence of this marketing must be submitted. If a plot has been marketed for a year and a buyer has not been found, the plot should be offered to the Council/Registered Provider, to increase the chance of plots being developed. If at the end of this process there has not been any interest in the plots, then the owner of the plot can build for sale on the open market.

- Planning will be refused where development is found not to make efficient use of land.
The marketing of plot/s, including at what point in the site’s development they should begin to be marketed, may be secured through a Section 106 agreement or condition.

Any residential proposals being brought forward will need to conform to other relevant policies in the Local Plan, including Policies EN 1: Design and other development management criteria and EN 2: Sustainable Design and Construction”.

| H12 Built to Rent | Dandara support the policy but believe that the affordable rented definition should be linked to the policy to reflect the wording set out within the PPG – affordable private rent rather than affordable rent and noted within the policy. | No revised wording proposed. Further clarification and links to the NPPF required. |
| OSSR2 Open Space Requirements | Dandara support the policy and that the standard requirements are set out clearly however there needs to be flexibility in the policy wording, to ensure that development is not unduly restricted. | No revised wording proposed. |
| TP1 Transport Assessments, Travel Plans, and Mitigation | Dandara support mitigation measures for the impact of development but consider that this policy should note that Kent County Council’s Highways Department and/or Highways England will collaborate with developers to establish and plan to achieve the required mitigations. | Suggested policy wording: “Demonstrate that the impacts of trips generated to and from the development are accommodated, remedied, or mitigated to prevent significant residual impacts, including where necessary an exploration of delivering mitigation measures, in conjunction with Kent County Council’s Highways Department and/or Highways England, ahead of the development being occupied”.

TP3 Parking Standards | Dandara supports the Council’s Parking Standards, including the acknowledgement that there may be justification for reduced standards as part of the comprehensive approach to the sustainable expansion of Paddock Wood However, the requirement for 15% of spaces to accommodate light goods vehicles should be removed as it is too prescriptive and such requirements should be determined on a site by site basis. | No revised wording proposed. |