

Antonia James – Principal Planning Officer
Tunbridge Wells Borough Council
Planning Services
Town Hall
Tunbridge Wells
Kent
TN1 1RS

Our Ref no. TCPS 618A
Your Ref: Pre-application advice: Response 18/00756/PAMEET
10th May 2019

Dear Antonia,

**Proposed Residential Development (approx. 75 dwellings)
and recreation open space
at land north of Pembury Road,
Tunbridge Wells, Kent**

Pre-Application Advice

I am contacting you further to our meeting on 16th April 2018 and, given the passage of time since, for your convenience, I have attached your subsequent pre-application advice response dated 9th May 2018. As you may recall, although this consultation was through the Council's 'pre-application' advice service, the proposal by Gleeson Strategic Land (Gleeson) relates to submissions to the Council's emerging Tunbridge Wells Borough Local Plan and specifically, the potential allocation of the above mentioned site.

Representations on behalf of Gleeson have been made at all the previous stages of the Local Plan production and it is noted that the Council intends to publish a Draft Preferred Tunbridge Wells Borough Local Plan for an 8 week consultation period later this year between August and September. Gleeson's position is that to meet future housing land requirements in the Borough, it is inevitable that some Green Belt land will need to be released for housing purposes and that the most sustainable location is around Tunbridge Wells given its function role as a regional hub.

As we discussed at our meeting, it is acknowledged that as part of the production of the Tunbridge Wells Borough Local Plan, the Council published a Green Belt Strategic Study in 2016 and a subsequent Tunbridge Wells Borough Green Belt Study (Stage 2) in 2017. Neither of these 'evidence based' documents have however, been the subject of any opportunity for public consultation, and as discussed at our meeting, Gleeson are concerned that these studies have not taken into account the specific nature of their representations submitted to the Council previously.

Gleeson has therefore, commissioned consultants to undertake its own Green Belt Assessment (copy enclosed), which takes account of the specific proposal for housing release at Sandown Park, north of Pembury Road, having regard also to the Council's two Green Belt studies.

The Council's study on the Green Belt in the vicinity of the Gleeson site focuses on parcel TW5, but this covers a much larger area than the specific proposal being put forward as a housing allocation. Therefore, the findings of the Council's Green Belt Assessment relating to parcel TW5 are not fully representative of the Gleeson proposal and its potential effect on this part of the Green Belt if the land were to be allocated for housing development.

We consider therefore, that it is important that in considering any Green Belt land release for housing purposes as part of the Tunbridge Wells Borough Local Plan, full consideration is given to the enclosed Green Belt Assessment Report.

In conjunction with this, I have also enclosed an updated Landscape and Visual Appraisal Report together with an Archaeological and Heritage Assessment Report.

Furthermore, subsequent to our meeting last April and as advised in your response, consultations have also taken place with Kent County Council Highways and Transport to seek 'pre-application' advice on the highway and parking implications of the proposed housing allocation. Accordingly, please also find enclosed a 'Technical Note' produced by i-Transport dated December 2018, together with the Highway Authority's response dated 5th February 2019. While the Highway Authority does not favour a signal controlled junction, a more acceptable junction arrangement would be a ghost island priority junction.

Drawing Number ITB12398-GA-005 (attached) shows the proposed revised access arrangements for a priority junction which, compared with the previous proposal for a traffic light controlled junction, has a much reduced physical and visual impact upon the roadside frontage and tress. This revised access proposal

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is also now reflected on the revised illustrative masterplan drawing no 1232/02 attached which in addition, incorporates amendments to the eastern boundary of the proposed housing area where the driveways have been scaled back and the houses have been turned to face towards the open space with further landscape planting added in response to comments contained in your previous consultation response.

As regards the Highway Authority's previous comments about the 'right turn out traffic modelling', Gleeson's appointed transport consultants (i-Transport) have confirmed that those turning right out of the site will face a delay and the modelling shows a 64 second delay on the minor arm as the 'Junction 9 Modelling' shows this 'by lane' rather than 'by direction'.

Finally, I appreciate that your response related to advice relating to potential planning application, whereas the Gleeson proposal relates to the proposed allocation of land as part of the Tunbridge Wells Borough Local Plan. I have therefore, also copied this letter and enclosures to Ellen Gilbert who also attended our meeting in her role as a Principal Planning Officer within the Local Plans Team.

Should you require any further information than please do not hesitate to contact me, but I would be grateful if you or Ellen could confirm that the enclosed documentation will be taken into account by the Local Plans Team in relation to this site and the Green Belt review as part of the emerging Local Plan.

Kind regards.

Yours sincerely,



Mike Pickup MRTPI

Cc. Ellen Gilbert

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List of Enclosures;

1. Pre-application advice dated 9th May 2018.
2. Green Belt Assessment by EDP dated May 2019.
3. Landscape and Visual Appraisal by EDP dated May 2019.
4. Archaeological and Heritage Assessment by EDP dated May 2019.
5. Technical Note by i-Transport dated 14th December 2018.
6. Response from the Highway Authority dated 5th February 2019.
7. Revised Masterplan Drawing No 1232.02
8. Revised Access Drawing No ITB12398-GA-005