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Tunbridge Wells Local Plan Regulation 18 Response

**In respect of land east of Sychem Lane, Five Oak Green
On behalf of Mr Mark Cubbon and Billings Group**

November 2019
DHA/14006



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1 Introduction

1.1 Purpose of this report

- 1.1.1 This representation has been prepared on behalf of Mr Mark Cubbon (the landowner) and the Billings Group - in response to the Tunbridge Wells Borough Council ('TWBC') Draft Local Plan Consultation, which runs until 15th November 2019.
- 1.1.2 Our clients are collaboratively promoting land east of Sychem Lane, Five Oak Green, which has not been included within the plan.
- 1.1.3 Based on the current national and local planning context, we consider this additional site to be suitable for development and we consider there to be 'exceptional circumstances' to release the land from the Green Belt as part of the plan making process. Furthermore, we consider the type of development proposed by our client better accords to the recommended approach to Green Belt release as set out within the National Planning Policy Framework (NPPF) 2019.
- 1.1.4 Give this context, this representation responds to the content of the draft plan (and relevant supporting documents), reinforces why the sites represent suitable locations to accommodate growth and outlines how development could be delivered on site.

2 The Tunbridge Wells Draft Local Plan

2.1 Overview

2.1.1 The TWBC Draft Local Plan (herein referred to as 'the plan') sets out the spatial vision, strategic objectives, and overarching development strategy for the borough. It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

2.1.2 The plan will set the agenda for development across the borough to 2036 and will replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

2.1.3 This representation comments on the following elements of the plan:

- *Vision and Strategic Objectives;*
- *Development Strategy and Strategic Policies;*
- *Place Shaping Policies;*
- *Development Management Policies; and*
- *Omission Sites.*

2.2 Vision and Strategic Objectives

2.2.1 The TWBC draft Local Plan is underpinned by a future vision up to 2036 and beyond. The vision is for Tunbridge Wells to be vibrant and prosperous and there is also an expectation that it will have grown significantly. The Council aim for growth to be infrastructure led and largely funded by new development. The key components of the vision are summarised below:

- The heart of Royal Tunbridge Wells and Southborough will be culturally rich, full of vitality, and will have the flexibility, robustness, and adaptability to cope with changes in the economy and other circumstances.
- Paddock Wood as a settlement will have developed considerably (including on land in eastern Capel parish) on the basis of garden settlement principles, using a comprehensive, master-planned approach.
- A new garden settlement will have been established at Tudeley Village, including homes, employment, and community facilities (which will continue to develop into the following years).
- High quality development at other settlements across the borough will have been realised, with the timely provision of relevant infrastructure
- Rural enterprise will have been supported, and the exceptional quality of the built and natural environments will have been protected and enhanced.

2.2.2 The plan stresses that all development will achieve high quality design, responding to the distinctive character of particular locations and in certain instances valued

and protected landscapes. Further, the timely delivery of infrastructure will be central to the plan.

2.2.3 In order to turn this vision into reality the plan sets a number of strategic objectives.

- 1) To deliver the housing, economic, and other needs identified for the borough by the end of the plan period through well designed, sustainable, plan led, and high quality development;
- 2) To achieve the delivery of all forms of infrastructure to mitigate the impact of development and where possible to result in 'betterment';
- 3) To prioritise active travel, but where necessary to plan appropriately for use by private motor vehicle, in particular embracing new technology;
- 4) To boost significantly the supply of affordable housing, and to seek to redress the disparity between house prices and income in the borough;
- 5) To ensure that the borough is vibrant, culturally rich, and economically buoyant;
- 6) To protect the valued heritage, and built and natural environments of the borough, including the AONB and to achieve net gains for nature;
- 7) To release appropriate land from the Green Belt through a plan-led approach, and to increase public accessibility, and to protect the openness of remaining Green Belt land;
- 8) To tackle climate change and minimise the impact of development on communities, the economy, and the environment with carefully considered design and by embracing technology, such as renewable energy generation;
- 9) To establish garden settlements as a model for the future delivery of development in the borough;
- 10) To work with neighbourhood plan groups to ensure the formation of locally-led policies, with this reflected in decisions on planning applications.

2.2.4 We support the general thrust of these objectives, which seek to meet identified housing needs in full and to boost the supply of new homes. We also consider it essential that the Green Belt is reviewed and suitable Green Belt land is brought forward for development.

2.2.5 However, we would suggest some minor modification to clarify that the plan is positively prepared and fully aligned with the provisions of the National Planning Policy Framework ('NPPF'). Indeed, as the Plan aspires to achieve the full development needs of the borough, we consider that objective 1 should be modified to make certain this point.

"To deliver the full housing, economic and other needs identified for the borough by the end of the plan period through well designed, sustainable, plan led and high quality development"

2.2.6 Furthermore, the release of a large expanse of Green Belt to facilitate a new settlement is yet to be fully tested and we question to what degree this approach accords with the guidance set out in the NPPF. We address these points in further detail within the subsequent sections below.

2.3 Development Strategy and Strategic Policies (Policy STR1)

2.3.1 The purpose of the Development Strategy is to outline how much development will be provided to meet the needs of the borough and where that development will be located.

2.3.2 In terms of the amount of housing, paragraph 59 of the NPPF states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. Further, to determine the number of homes needed, strategic policies should be informed by a local housing needs assessment conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

2.3.3 The Council confirm that their housing need target for the plan period 2016–2036 is 13,560 dwellings (678 dwellings per annum), which is calculated using the Government's standard method and the 2014-based household projections.

2.3.4 In terms of the different supply components, the Council consider that the Local Plan must (as a minimum) include additional allocations to accommodate 7,593 homes. This figure was formulated taking into account; completions since April 2016 (1,552); extant planning permissions (3,127); outstanding site allocations (588) and a windfall allowance (700 dwellings). The Council have applied a 10% non-delivery rate to these figures to err on the side of caution and consider that the plan would exceed the minimum housing requirement if all of the supply components were achieved.

2.3.5 We agree that TWBC is capable of meeting its need in full and support this approach to plan-making. Likewise, we support the general thrust of the development strategy, which proposes a strategy to meet the housing needs of the borough with a dispersed growth approach. Nonetheless, we have concerns regarding the deliverability of the strategy and the potentially over optimistic housing trajectory, particularly in respect of the delivery from key strategic sites (as outlined below).

2.3.6 In this respect, the emerging strategy is consolidated by Policy STR1, which sets out the quantum of development that will be allocated within or around settlements to meet the identified needs of the borough over the plan period. This strategy would seek to meet the majority of the Council's housing need through the strategic extension of Paddock Wood and via a new Garden Village within the Green Belt at Tudeley. The remaining growth would then be dispersed proportionately to other settlements in the borough.

- 2.3.7 We support the general principle of proportionately spreading the benefits of growth and we recognise the opportunity to direct a greater level of growth to villages and towns compared with previous plan periods. Furthermore, adopting a pattern of dispersed growth approach would allow a number of sites to be developed at the same time, serving different segments of the local housing market, which is preferable to saturation of the market in a single area.
- 2.3.8 Nonetheless, we have some concerns regarding the balance between strategic and non-strategic scale allocations and the anticipated delivery trajectory. For example, 65% of new allocations would be delivered as part of the strategic extension to Paddock Wood (4,000 homes) and the new Garden Village at Tudeley (1,900 homes within the plan period), both of which require a fully master-planned approach, which is a time-consuming process. Furthermore, there are a significant number of existing commitments within Paddock Wood that have been slower at coming forward than had originally been envisaged. A cautious approach is therefore needed.
- 2.3.9 In this regard, we would draw the Council's attention back to the 2016 document published by Nathaniel Lichfield's and Partners (NLP) - *'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver'*, which provides evidence pertaining to the speed and rate of delivery of large-scale housing, based on a large number of sites across England and Wales. It identifies that the average lead in time for the submission of a planning application is 3.9 years, from the date the site is first identified. In terms of the planning approval period, for larger scale sites (2,000 + homes) this is circa 6 years. After planning permission is granted, larger sites start to deliver within a year and the average build out rate thereafter is 161 dwellings per annum.
- 2.3.10 On the basis of this research, if the Local plan is adopted by 2021, planning permission approved by 2023 and delivery commences within 6 years (2029), the likely deliver for the plan period would be circa 966 homes.
- 2.3.11 Despite this evidence, TWBC has set a much more optimistic trajectory for delivery of Tudeley Garden Village and the strategic extension of Paddock Wood, which is detailed in the Housing Trajectory Paper. The Council forecast that the Tudeley Garden Village will begin to deliver homes from 2025/26 onward, with an initial build out rate of 150 dwellings per-annum, rising to 200 dwellings per annum from year 6 onward. Likewise, the Council suggests that the extension to Paddock Wood will start to deliver in 2024/25 at an average build out rate of 333 dwellings per annum – which is nearly double the average rate for larger schemes identified in the NLP document. This higher build out trajectory is predicated on the basis that there would be a number of house builders involved the construction of different parts/phases. However, by their own admission, TWBC do not currently know how many housebuilders will be involved.
- 2.3.12 With the above in mind, our view is that the Council have applied drastically overly optimistic development trajectory for the delivery of strategic sites, both in terms of the start date for completions and the expected build out rates. Accordingly, we would encourage the Council to increase the balance of small and medium sized sites, which can deliver quickly and usually require limited intervention to infrastructure. This would also provide a greater degree of flexibility for the plan in the event that strategic sites are delayed.

- 2.3.13 In addition to the concern about slow delivery, we object to the potential impact that a new garden village would have on a settlement such as Five Oak Green if it means future development will be sterilised. In this regard, our client is promoting a sustainable and logical site on the edge of the village. However, owing to the scale and proximity of Tudeley the Council has effectively and unjustly ruled out further growth of the village and has made no allowance for any growth within the plan period. In our view, this is wrong and the ability of an existing settlements to evolve and thrive should not be sacrificed just to facilitate a new garden village.
- 2.3.14 Furthermore, the NPPF (para 138) is clear that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 2.3.15 Our client's land is well served by a local village bus stop. Furthermore, it is situated in good proximity to a much wider range of opportunities situated in Paddock Wood. More compellingly, there are significant opportunities available to provide public access to the land and provide a meaningful contribution towards ecological and green infrastructure enhancements and provide public access.



Masterplan for proposed site

- 2.3.16 On the basis of the above, we consider that there are sound planning policy grounds to a proportionate level of growth to Five Oak Green

2.4 Objection to the omission of SHELAA Site 29

Evidence

- 2.4.1 The SHELAA's basis for rejecting the inclusion of site 29 is extremely limited, with the only justification being that 'there is concern about landscape impact and the in principle Green Belt objection'.
- 2.4.2 However, the SHELAA is not a policy document and instead should be a 'policy off' technical assessment of site availability. For this reason, the site should be identified as being suitable, available and achievable given it is the control of a developer and has no overriding constraints. Furthermore, on the basis that TWBC's SHELAA appears to only find sites suitable for development where they are then allocated, this means it is not a robust and reliable piece of evidence base upon which sound decisions can be reached.
- 2.4.3 The Council has accepted that the unmet housing need in the borough is sufficient to amount to exceptional circumstance to justify a review of Green Belt boundaries and this approach has been endorsed by the Court in the Hunston High Court judgement in St Albans where judge stated:

'Having identified the full objectively assessed needs figure the decision maker must then consider the impact of the other policies set out in the NPPF. The Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances. It is entirely circular to argue that there are no very special circumstances based on objectively assessed but unfulfilled need that can justify development in the Green Belt by reference to a figure that has been arrived at under a revoked policy which was arrived at taking account of the need to avoid development in the Green Belt.'

- 2.4.4 It should also be noted that neighbouring authorities such as Sevenoaks, Tonbridge and Malling and Tandridge are all instigating Green Belt release.
- 2.4.5 We are concerned with the Council's approach to Green Belt release in a single location. In this respect, *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin)) provides very clear guidelines for determining whether exceptional circumstances exist.

'planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

(i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);

(ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;

(iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;

(iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and

(v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent'.

- 2.4.6 Considering these parameters, the acuteness of the local housing need is clear. The Council's housing need is more than double what has previously been required and urban sites have been depleted since the last wholesale review of the Green Belt boundaries.
- 2.4.7 As with the acuteness of need, the constraints of the borough are indisputable. There are a number of archaeological and heritage sites, including 45 Historic Parks and Gardens, 25 Conservation Areas and 11 Scheduled Ancient Monuments. In addition, there are approximately 3,000 Listed Buildings.
- 2.4.8 The landscape of the High Weald AONB contains numerous historic landscape features, including field patterns, settlements and ancient woodland, whilst the borough also hosts a number of, or is close to, areas of ecological importance. These include:
- (1) Ancient Woodland (approximately 16% of the borough)
 - (2) Circa 60 Local Wildlife Sites (approximately 11% of the borough)
 - (3) Ten Sites of Special Scientific Interest (SSSI)
 - (4) Five Local Nature Reserves (including one Community Woodland)
 - (5) One Regionally Important Geological Site, at Scotney Castle Quarry.
 - (6) The nearby Ashdown Forest is a designated Special Area of Conservation (SAC) and Special Protection Area (SPA).
- 2.4.9 Although not an environmental constraint, the Metropolitan Green Belt covers 22% of Tunbridge Wells borough.
- 2.4.10 Given the above constraints, it is acknowledged that planning for housing requires the need to balance a number of core environmental and planning matters in order to reach a sensitive future development strategy.
- 2.4.11 In respect of the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced, this is to be judged on a site by site basis, but there is little doubt that there are far greater opportunities to mitigate impact by releasing small parcels of land compared with that of a strategic new village scale.
- 2.4.12 Taking the above into consideration, it is our view that the Calverton judgement sets out very clear parameters for assessing whether Exceptional Circumstances exist and that a sound case could be made for releasing our client's land in line with NPPF guidance. Some growth for Five Oak Green should therefore be revisited and such allocations should not be rejected just to facilitate Tudeley.

3 Section 6: Development Management Policies

- 3.1.1 In addition to our comments on the strategy, we have reviewed the proposed replacement development management policies as set out in chapter 6 of the document.
- 3.1.2 In general terms, we would refer back to paragraph 15 of the NPPF that promotes succinct and up-to-date plans, which provide a positive vision. In contrast, the draft policies currently proposed are of such prescriptive detail that they are neither positively prepared nor flexible enough to allow for a range of different circumstances. Furthermore, many aspirations result in inevitable conflict. On this basis, we would recommend that the majority of proposed policies are simplified and where additional guidance is needed, this be included within secondary Supplementary Planning Documents.
- 3.1.3 Turning to detailed policies, there are a number of contradictory elements that need to be remedied before the plan proceeds to Regulation 19. For example, policy EN1 seeks to ensure development is consistent with the established character and surrounding form. However, policy EN4 places significant emphasis on measures to radically reduce greenhouse gas emissions. The provision of a step change towards more sustainable construction and climate change is, inevitably going to result in a need for a change in attitude towards design, material and construction. Accordingly, a cohesive policy approach is needed that allows innovative and different design if supported on wider environmental and planning grounds. As drafted the policies are too inconsistent.
- 3.1.4 A number of policies also seek to provide guidance rather than policy. For example, policy EN6 seeks to clarify what information is needed in order to assess a heritage proposal. This level of information should instead feature within a support SPD not policy.
- 3.1.5 In respect of the natural environment, policy EN20 seeks to protect the rural landscape. It states that 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 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 landscape character where it has been eroded; and*
 - 5. Preserve intrinsically dark landscapes in accordance with Policy EN 10: Outdoor Lighting and Dark Skies'.*
- 3.1.6 We 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. We suggest it be amended to read:

'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 EN 10: Outdoor Lighting and Dark Skies'.

3.1.7 Turning to housing policies, we have significant concerns about the drafting of several policies, that show a degree of misunderstanding of the development industry. For example, policy H1 states:

'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 two years from the date of decision; or

2. That groundworks and the construction of the ground floor base of at least two buildings be completed within three years of the permission'.

3.1.8 Whilst the majority of developers would aspire to be 'on site' and under construction within 2 years, the reality is that there are often processes that need to be adhered to that are outside of the applicant's control, including the need to formally conclude land purchases, to discharge conditions and to deliver off site mitigation. There are also 'non planning' consents that need to be achieved for example Section 278 Highway works, infrastructure agreements (S38 of the Water Industry Act), ecology licensing etc

3.1.9 The Council will also be aware that commencement of development is often prohibited by seasonal restrictions in respect of ecology and wider constraints.

3.1.10 The second requirement for two buildings to be commenced is arbitrary, for example what is the test for single unit schemes or conversion works? The correct test should be as set out in statute i.e. 'a material start'.

3.1.11 With the above in mind, we consider the Council's policy should be deleted or modified to the extent that it will endeavour to agree a two year start date based on site circumstances.

3.1.12 In respect of policy H2, and the preference for Multi-developer schemes and comprehensive masterplanning, we understand the aspiration. However, in reality

such stringent requests often result in conflict and further delay and the Council should be careful not to try and impose itself on wider commercial arrangements that may prohibit rather than assist delivery. With this in mind, it is our view that the Council should shift focus away from how it wishes to change development industry practices and instead concentrate on what it can influence, namely the provision of detailed guidance for the proposed site allocations (including potential phasing plans and areas zoned for different forms of development). The Council could also consider imposing a illustrative delivery trajectory as part of the validation process.

- 3.1.13 We note that policies H3 and H4 have regard to housing mix and density yet provide little or no detailed requirement. On the basis that mixes must reflect market requirements, we consider any aspirational densities would be better placed being inserted into the wider reaching policy EN1.
- 3.1.14 Policy H5 sets out affordable housing requirements. Whilst we support the general thrust of the objectives and the securing of affordable provision, we object to the rounding up of the calculations and contributions being based on a net rather than gross number of units. For small scale proposals this will often see the proposed percentage increase to closer to 45% and 35% respectively. Such thresholds would therefore need to be tested and justified by evidence. A pragmatic approach would be to apply traditional rounding up or down.
- 3.1.15 The phasing of affordable provision also needs to be sufficiently flexible so as to not prohibit wider delivery. In this regard, we consider that entering into contract with a registered affordable prior ahead of the 50% occupation should provide the certainty of delivery, but without risking a wider delay in market delivery.
- 3.1.16 We also object to the expectation of sites that provide between one and nine units to pay a contribution towards affordable housing. This conflicts with Paragraph: 023 Reference ID: 23b-023-20190901 of National Planning Practice Guidance, which states planning obligations for affordable housing should only be sought for residential developments that are major developments. Any reduced threshold should be restricted to designated areas only and should be underpinned by detailed evidence.
- 3.1.17 The Council will be aware of wider country wide discussions regarding the viability of providing social rented accommodation as part of a wider offer. Such provision is becoming increasingly difficult and without robust policy in place that addresses this matter, this matter is likely to significantly slow delivery.
- 3.1.18 We note that the Council is only willing to allow the use of Vacant Building Credits in exceptional circumstances. However, the test proposed appear significantly more onerous than have been considered and applied elsewhere. Based on the tests proposed, we fear that there will be a delay in genuinely vacant buildings, that are entitled to use of VBC, to be delayed in coming forward in order to meet the overly onerous criteria.
- 3.1.19 Paragraph 6.160 states:

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

be ecological mitigation and enhancement for the woodland rather than the amenity of the proposed development.”

3.1.20 The advice from the Government’s statutory advisor on biodiversity, Natural England, states that:

*“For ancient woodlands, you should have a buffer zone of at least **15 metres** to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone.”^[1]*

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

3.1.22 In summary, whilst this overview is not exhaustive, we do have concerns about the nature of the proposed policy framework and the degree to which it appears to be trying to limit and frustrate development. Accordingly, in the interests of positive planning, we recommend that the policy framework is simplified and refined and subject to further detailed consultation and focussed on planning matters.

^[1] <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

4 Conclusion

- 4.1.1 This representation has been prepared on behalf of Mr Mark Cubbon and Billings Group in response to the Tunbridge Wells Borough Council Draft Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy.
- 4.1.2 In this respect, we support the aspiration to meet housing need in full and consider that a dispersed growth strategy represents the optimum means to achieve this. Nonetheless, we object to the exclusion of our client's land at Five Oak Green purely to facilitate development at Tudeley.
- 4.1.3 Furthermore, we consider that the Local Plan strategy relies heavily on the delivery of strategic sites that would require the provision of supporting infrastructure. Moreover, the Council have applied overly optimistic projections to the delivery of housing for the extension of Paddock Wood and the Tudeley Garden Village, largely disregarding the NLP 2016 report and the time it would take to masterplan the strategic sites and deliver the required infrastructure.
- 4.1.4 In our view, a more realistic trajectory would see some housing delivered, albeit not at the suggested build out rates and much later in the plan period. Further small to medium sites are therefore needed and they should be directed to locations such as Five Oak Green that have been afforded no growth.
- 4.1.5 I trust the contents of this representation are clear and I hope the comments are useful in guiding the forthcoming stage of the plan making process.