

15<sup>th</sup> November 2019

Proposed Draft Local Plan- Regulation 18 Consultation  
Tunbridge Wells Borough Council  
Mount Pleasant Road  
Royal Tunbridge Wells  
Kent  
TN1 1RS

Our reference: WELL1983

Dear Sir

**DRAFT LOCAL PLAN (REGULATION 18) CONSULTATION  
LAMBERHURST CAR PARK, BREWER STREET, LAMBERHURST, KENT**

We write on behalf of our client Wellsbridge Estates Ltd who wish to make representations regarding the policy approach to Lamberhurst. We acknowledge that the Tunbridge Wells Draft Local Plan 2019 proposes to allocate between 50 - 60 houses in the village of Lamberhurst. In light of the proposed allocations we consider that as a matter of principle residential development in Lamberhurst is acceptable and that the settlement performs adequately in terms of sustainability. Within the context of this we would like to make representations on two sites identified in the draft local plan and an additional site we believe the council should consider for allocation. The sites are as follows:

- Misty Meadow, Furnace Lane
- Land to the West of Spray Hill
- Car Park for former Slaughterhouse, Brewer Street Lamberhurst and Land at 36 Brewer Street, Lamberhurst (see attached SHELAA assessment entries).

Misty Meadow, Furnace Lane

Following on from the SHELAA assessments the Draft Regulation 18 Local Plan has proposed in policy AL/LA 2 to allocate 25-30 residential dwellings on land known as Misty Meadow, Furnace Lane. Having reviewed the SHELAA entry for the land it is clear that there are several concerns regarding the allocation. Firstly, the land is distanced from the village development boundary by approximately 100 metres and as such is poorly integrated. Secondly, Furnace Lane is predominantly characterised by a ribbon form of residential development. As such the proposed allocation would result in backland development which would be contrary to policy and out of keeping with the surrounding residential character of the locality.

Irrespective of this fact the site has still been brought forward for allocation. Lastly, the SHELAA entry for the site notes that '*parts of the site are sensitive in landscape terms.*' The site is very exposed and poorly contained in relation to adjacent residential development. In this regard it is considered that there are more appropriate alternative sites which would be more appropriate in Lamberhurst as will be detailed in subsequent paragraphs.

#### Land to the West of Spray Hill

It is acknowledged that the council proposes to allocate land to the west of Spray Hill for 25-30 residential dwellings within policy AL/LA1. We do not wish to contend this allocation and have no objection. It is clear that this allocation provides wider benefits to Lamberhurst including an extension to Lamberhurst Primary School and the intention to provide improved pedestrian and cycle linkages in the locality and in relation to the Scotney Castle Estate.

#### Car Park for former Slaughterhouse, Brewer Street Lamberhurst and Land at 36 Brewer Street, Lamberhurst.

The land known as 'Car Park for former Slaughterhouse, Brewer Street' and 'Land at 36 Brewer Street, Lamberhurst' has been assessed by the council as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) produced in conjunction with the Draft Regulation 18 Local Plan under two separate entries; references 1 and 363 respectively. After consideration the council concluded that both sites were '*unsuitable as a potential site allocation*'. It is our view that when viewed as one entity these sites represent an ideal allocation for residential development as will be explored in more detail below.

Briefly in regard to the specifics of the site. The sites accumulate to measure approximately 1.22 hectares and comprise a former car park previously used in association with a slaughterhouse. The site also contains a residential property and its curtilage. The site is adjoined by residential properties, allotments and fields. The boundaries of the site are a series of hedgerows. At present the area of land containing the former car park is accessed via a track which runs up to the southern boundary adjacent to the allotments. There also exists a vehicular driveway from Brewers Street which at present serves a single residential dwelling and its curtilage.

The SHELAA entries for the sites have expressed several concerns which have led to the council determining that the site is unsuitable for allocation. The entry for reference 1 states that '*there is a landscape concern about the allocation of this site and concern about deliverability*'. In relation to entry reference 363 the council considered that the '*allocation of this site would result in unacceptable back land development*'. Whilst these points have been acknowledged it is our view that if the sites are considered collectively as a single entry, as is proposed by our client that the issues raised can be overcome. In this respect we have the following comments:

- First, the SHELAA assessment noted that there were highway issues in relation to site reference 1. By considering sites referenced 1 and 363 together, an acceptable means of access can be achieved by using the access from Brewers Street associated with reference 363. It is considered that with improvements, this access is suitably located and capable of providing access to the site in its entirety. In terms of deliverability, it is considered that this access solution can provide the council with more certainty as it is within the ownership of 36 Brewers Street.
- Second, it is noted that the council reached the conclusion that the land at reference 363 would result in unacceptable backland development. By considering the two sites as a single entity, a more comprehensive and coordinated form of development can be achieved, such that the suggestion of backland development is no longer relevant.
- Third, a more coordinated development of the site will be in keeping with the character of residential development adjacent at Hoggarden Close. The location of the allotments will be a buffer from existing housing. In terms of the potential wider effect of the development the SHELAA assessment of site ref 1 mentions landscape concerns as a factor that contributes to the unacceptability of the site, such that it is unsuitable for allocation, although it remains unclear as to how this conclusion has been drawn. The overall assessment of the potential for sites 1 and 363 to collectively accommodate 37 dwellings is potentially unhelpful in this respect; it is not clear how the council's capacity analysis has been reached. A smaller development is entirely practicable, and would facilitate a less dense, more open form of development that would respect the location of the sites on the edge of the village. In our view this would produce a more appropriate form of development.
- Fourth, in locational terms it has been noted that the site 'is let down by a lack of key services and options for public transport'. As expressed earlier it is considered that the council having proposed to allocate 50-60 houses in Lamberhurst have considered that as a matter of principle residential development in Lamberhurst is acceptable and performs adequately in terms of sustainability. It is therefore considered that this site is located adjacent to the development boundary for Lamberhurst and thus there is sufficient opportunity to access key services and facilities. It is also apparent from the manner in which the council has considered other allocations in Lamberhurst that the question of access to services and location of public transport has not been seen as a defining reason for not allocating land for development as is clear from the proposed allocation at Misty Meadow, Furnace Lane in which the SHELAA entry recognises that there would be 'dependency on private car use'.

In light of the above the allocation of the land at site refs 1 and 363 should be obvious; it is a logical and acceptable location for additional small-scale development adjacent to the village boundary. The allocation should be made as a single entity. At present the absence of the allocation leads us to believe that the plan is not justified, in that it is not putting forward an appropriate strategy taking into account reasonable alternatives. As such, the plan at present cannot be considered to be robust nor reliable. This representation demonstrates that the council must reconsider that land at reference 1 and 363 as a single entity for allocation. The land represents an excellent opportunity and we consider that the site allocation be modified accordingly. It is clear that opportunity does exist here.

Yours faithfully

Shannon Fenlon

MSc

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**Strategic Housing and Economic Land Availability Assessment (SHELAA) for Draft Local Plan – Regulation 18 Consultation**

<b>Site ref:</b>	1	<b>Gross area (ha):</b>	0.83
<b>Site address:</b>	Car park for former Slaughterhouse, adjacent to Brewer Street/Hopgarden Close, Lamberhurst	<b>Developable area (ha):</b>	0.83
<b>Parish:</b>	Lamberhurst	<b>Settlement:</b>	Lamberhurst
<b>Site Type:</b>	Part PDL adjacent to built development and in proximity to LBD		
<b>Potential site use:</b>	Site has been assessed for development potential, notably for residential use		
<b>Potential yield if residential:</b>	25		
<b>Issues to consider</b>	AONB (3 component parts); Highway issues (access); Ecological interest; notable feature/designation; Land contamination (abattoirs and animal slaughter); ALC: Grade 3		



<b>Site description:</b>	The site comprises an overgrown parcel of land that includes a former car park. The site is divided into two parts by a hedgerow. There are no existing buildings on the site. The site is adjoined by residential properties, allotment gardens and fields. The boundaries of the site comprise hedgerows. There is a gate adjoining Brewer Street on the south of the site. A track serving the allotments runs up to the southern boundary of the site. There is no pedestrian access currently available into the site except via the track serving the allotments. There are pavements in the vicinity along Brewer Street and Hopgarden Close. The site is at a raised level relative to
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**Strategic Housing and Economic Land Availability Assessment (SHELAA) for Draft Local Plan – Regulation 18 Consultation**

	Hopgarden Close. The site itself is generally flat. The site is visible from Hopgarden Close.		
<b>Suitability:</b>	Unsuitable: see reason below		
<b>Availability:</b>	Available		
	Single ownership		
<b>Achievability:</b>	N/A		
<b>Sustainability Assessment:</b>	A site that scores several neutrals with some positive scores. It is let down by a lack of key services and options for public transport.		
<b>Conclusion:</b>	This site is considered unsuitable as a potential site allocation.	<b>Reason:</b>	There is a landscape concern about the allocation of this site and concern about deliverability



**Strategic Housing and Economic Land Availability Assessment (SHELAA) for Draft Local Plan – Regulation 18 Consultation**

<b>Site Description:</b>	There is a residential property and curtilage including a car port currently on site. There is also a swimming pool. Adjoining uses include residential properties, a small car park type area, allotments, and a field. Boundaries are mainly hedging and trees. There is a long vehicle access drive from Brewers Street. There is some pavement along Brewers Street. The drive rises up from Brewer Street and then flattens out. This site is generally enclosed.		
<b>Suitability:</b>	Unsuitable: see reason below		
<b>Availability:</b>	Available		
	Multiple ownership		
<b>Achievability:</b>	N/A		
<b>Sustainability Assessment:</b>	A site that scores many neutrals with some positive scores. It is let down by a lack of key services and facilities and public travel options.		
<b>Conclusion:</b>	This site is considered unsuitable as a potential site allocation.	<b>Reason:</b>	Allocation of this site would result in unacceptable back land development.