

# HORSMONDEN PARISH COUNCIL

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TUNBRIDGE WELLS, KENT  
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6<sup>th</sup> November 2019

Dear Mr Baughen

## **TUNBRIDGE WELLS BOROUGH COUNCIL (TWBC) – DRAFT LOCAL PLAN CONSULTATION**

Thank you for the opportunity to comment on the draft Tunbridge Wells Local Plan. This letter sets out the comments of Horsmonden Parish Council (HPC), agreed at a public meeting of the parish council held on Monday 4 November. The comments have been formulated with input from the Horsmonden Neighbourhood Plan Steering Group, which has been working on developing a neighbourhood plan for the parish, in parallel with work on the draft Local Plan.

We would like to make comments on three areas of the draft Local Plan. These are:

- The overall planning strategy
- Place shaping policies for Horsmonden
- Planning policies

### **1. The overall planning strategy**

In draft policy STR1, TWBC have chosen an overall development strategy based on Option 3 (dispersed growth) and Option 5 (new settlement), which were two of the options aired in the “Issues and Options” consultation in June 2017. At that time, HPC objected to a dispersed growth strategy. **We continue to object to the “dispersed growth” strategy for housing development as the basis for the Local Plan’s development strategy. We consider that this strategy is inherently unsustainable.** This is because it directs a disproportionate amount of growth to rural settlements with limited facilities and jobs, and with poorer access to public transport. These settlements have higher dependence on the private car and access to them is generally along low capacity rural roads and lanes.

In our view, it would be better to direct more growth to the main urban area of Tunbridge Wells/Southborough, where by far the best range of jobs, facilities and public transport are available and opportunities for higher density development, or along a growth corridor –such as the A21 or railway lines- where there is high capacity transport by road, rail or bus. This provides new households with more sustainable access to facilities and jobs. (Options 2 and 4)

Our concerns over the “dispersed growth” strategy in the draft Local Plan are based in both the National Planning Policy Framework and the Borough Council’s own evidence base for the draft Local Plan.

The NPPF states that “*planning policies and decisions should play an active part in guiding development towards sustainable locations*” (paragraph 9) and that “*growth ... should be focused on locations which are, or can be made, sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health*” (paragraph 103). These extracts are also quoted on pages 5 and 6 of the TWBC Local Plan Transport Evidence Base: Transport Assessment Report (September 2019)

TWBC’s Transport Strategy Review: Context and Way Forward, in its section on “Rural Transport Issues” (Page 16) leads with the two following quotes (box below) which, in our view, eloquently make the case against a “dispersed growth” planning strategy which directs large scale development to rural settlements:

*“It is far easier to change travel behaviour in urban areas”* (Gordon Stokes, “Transport and the Rural Economy” presentation, Transport Studies Unit, Oxford University, 2016)

*“On average, people living in the most rural areas travel 45% further per year than those in England as a whole, and 53% further than those living in urban areas”.* (Action with Rural Communities in Rural England, website, 2019)

**Policy STR1 sets out the proposed development strategy for the Borough, but this is disconnected in some important respects with the settlement hierarchy identified earlier in local plan work.** In the Issues and Options document (page 13), TWBC appear to identify a four-tier hierarchy of settlements:

Tier	Settlement hierarchy	Settlements
1.	Main Town	Royal Tunbridge Wells / Southborough
2.	Rural towns	Paddock Wood, Cranbrook, Hawkhurst
3.	Rural settlements	Langton Green, Speldhurst, Rusthall, Bidborough, Pembury, Matfield, Brenchley, Five Oak Green, <b>Horsmonden</b> , Goudhurst, Lamberhurst, Kilndown, Sissinghurst, Frittenden, Sandhurst, Iden Green, Benenden
4.	Smaller rural settlements	All other rural settlements

In many local plans (for example, Mid Sussex, Maidstone, Dover) this hierarchy then forms the basis of the development strategy, or a specific planning policy, where the future pattern of growth reflects the place of settlements within the hierarchy. This means that larger scale development is focused in the higher level settlements best suited to accommodate it, with lesser amounts of development as one progresses down the hierarchy. There is a significant disconnect in the draft Local Plan, in that some tier 2 settlements (such as Paddock Wood) and some tier 3 settlements (such as Horsmonden) have significantly more growth allocated to them than would be expected

from their place in the hierarchy. In addition, some rural settlements in tier 3 have much higher levels of growth allocated to them than others at the same level (again Horsmonden), even though some of the others at this level are in much closer proximity to the main town of Tunbridge Wells with all its facilities, job opportunities and access to public transport.

**We would like policy STR1 to have a clearer and more explicit relationship between the settlement hierarchy and the scale of development proposed in different parts of the borough.**

Whilst HPC accepts that Horsmonden should accept some growth appropriate to its location, the range of facilities available, local infrastructure capacity and the sensitive rural environment, **we consider that the level of growth proposed for Horsmonden in the draft Local Plan (225 -305 dwellings) is excessive and unsustainable.** This represents a 25% -30% expansion in the size of the village in a period of less than twenty years up to 2036, much higher than our neighbours in Lamberhurst, Goudhurst, Brenchley and Matfield.

Our main concerns on the scale of growth proposed for Horsmonden are:

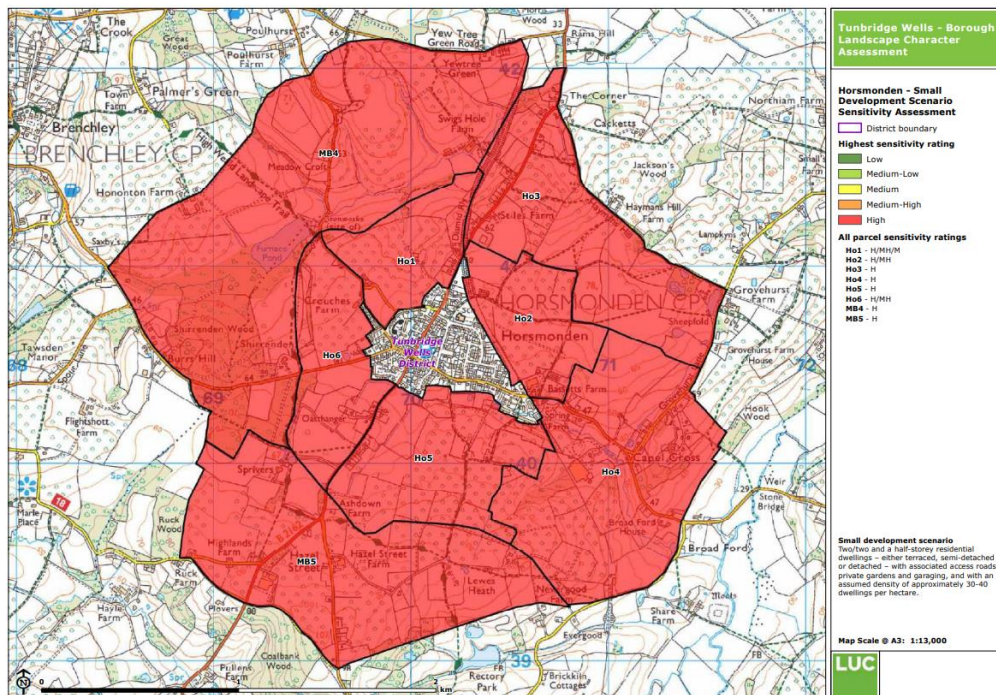
- (a) Horsmonden is **relatively remote** from the main town of Tunbridge Wells (and to other more distant main towns which also offer a wide range of facilities and jobs, such as Tonbridge and Maidstone), from railway stations and from high frequency bus services. Horsmonden does not even have a daily bus service to Paddock Wood, the nearest rail station, let alone a bus service that will support those commuting to London and other centres, requiring early morning and evening services. As such, any growth in Horsmonden will be highly car dependent. This contradicts Government targets to reduce carbon emissions and mitigate climate change.
- (b) the **additional traffic** generated on the low capacity roads and lanes through the village and its effect on traffic congestion and safety, and the ease with which local residents can move around the village on foot or bicycle. (We are keen to promote a “walkable village”). These concerns focus on, but are not limited to, the village centre (a conservation area) and its notoriously difficult crossroads with a high accident rate. Traffic conditions in the village are exacerbated by a significant volume of through traffic (particularly on the Goudhurst and Brenchley Roads), heavy goods traffic, extensive on-street parking, and lack of a central village car park, all of which can hinder the safe and smooth flow of traffic and add additional risk to vulnerable road users and pedestrians.
- (c) **local infrastructure** – including education, primary health care, community and cultural facilities, broadband speeds and mobile phone coverage – has a limited capacity and is not currently suitable to accommodate significant growth. Whilst we welcome the Local Plan’s “expectation” in draft policy STR/HO1 that developer contributions will be sought to upgrade facilities, and mitigate the impact of development, there is no guarantee that infrastructure will be provided in step with housing growth.

Our concerns are that developers will plead “lack of viability” to avoid financial contributions through section 106 agreements or that, if TWBC introduces a Community infrastructure Levy, funds raised through development in Horsmonden will not all be spent there. It is

frequently the case that such developer contributions do not realise all the funds necessary to achieve timely infrastructure investment in step with development, and local authorities are usually in no position to make good any deficiencies.

- (d) **impact on the local environment** will be significant. We appreciate that the draft Local Plan contains a large number of planning policies intended to safeguard important aspects of the local environment ( policies EN1-32), but we remain concerned that some highly valued features of the local environment will be adversely affected by the proposed scale of development, in particular the local landscape, as was highlighted in TWBC’s own evidence base in “Landscape Sensitivity of Additional Settlements in Tunbridge Wells” (July 2018).

The Local Plan sometimes has a tendency to see the landscape in a binary form (AONB= safeguard from development / other areas = negotiable). This puts parishes like Horsmonden, where parts are in the AONB and parts are on the edge of it, in a difficult position. The areas beyond the designated area contribute to the setting of the AONB and are, in themselves, attractive and locally valued landscape with a very distinctive character. The majority of the parish forms part of “The Fruit Belt” with its orchards, hop gardens, vineyards, shelter belts and twisting country lanes). TWBC’s background document (above) concludes that the Horsmonden landscape has a sensitivity of “High” or “Medium High/High” for even small-scale developments. All the proposed development allocations in Horsmonden involve loss of green field sites around the edge of the village.



They are by no means “small sites”, with two of the three proposed allocations delivering potentially 100 houses or more. These allocations are in addition to the 17 new houses currently under construction adjacent to Kirkin’s Close.

**For all these reasons, we ask TWBC to look again at its development strategy and to reduce the scale of housing development proposed for Horsmonden.**

## **2. Place-shaping policies for Horsmonden**

### **(a) Policy STR/HO1 Strategy for Horsmonden Parish**

- Our concerns about the overall scale of development proposed for Horsmonden (225-305 dwellings) are set out in detail above.
- Our concerns about the weight and value to be attached to sites outside the AONB are set out above, and are only partly offset by the approach in section 4 of the draft policy. We think some reference to the intrinsic qualities of countryside areas beyond the AONB are needed (as set out in TWBC's own landscape analysis for the Local Plan) and that this policy should not just rely on passing references to "AONB setting" in the High Weald AONB Management Plan and its supporting guidance.
- Our concerns about the strength of the linkage between housing growth and the provision of upgraded infrastructure through developer contributions are also set out in detail above. The term "expectation" is not sufficiently robust.
- The reference to "greenfield windfall sites of larger than 100 units" has caused some consternation locally, especially if developed in addition to the three proposed housing allocations for the village. Any such development would be a big issue for a rural settlement such as Horsmonden. We consider that this reference to "greenfield windfalls" would be better as an element of a general strategic policy across the borough.
- The Policy should refer to a limitation of 10% maximum increase in the total housing allocation for Horsmonden to be via windfalls, in order to avoid mass development by this means.
- Further development in the village would require new community facilities in a suitable location, accessible for all members of the community. This should include a village hall, with meeting rooms, shared parking etc. with other community facilities. Lenham (Kent) and Etching ham (East Sussex) are nearby examples of what can be done.
- The policy should have some reference to local housing needs in Horsmonden and the need for the mix of housing on allocated sites to address local needs for affordable housing and more smaller size housing (1/2 beds), particularly to meet the needs of young people wishing to remain in the village where they grew up, and for older people who wish to "downsize" or have supported or sheltered housing, and so maintain their family and social links, and the support they provide, in the

local community. This approach is supported by evidence gathered by the Parish Council.

- We would welcome the opportunity for economic development in the parish by, for example, the provision of a business centre with shared office space. This will help to offset the need for longer distance commuting to find work.
- We accept that the current “Limits to Built Development” may need to be extended to accommodate any new housing allocations beyond the current boundary.

**(b) Policy AL/HO1 Land adjacent to Furnace Lane and Gibbet Lane**

- This site is the subject of a current planning application (18/1976/FULL) for 49 dwellings. We accept that the proposed allocation in the draft Local Plan will need to be reviewed in the light of whatever decision is made on that application.
- The Parish Council has objected to both the original and revised plans for this application on traffic, parking and pedestrian safety grounds. One is prompted to question whether this site makes a sound basis for a Local Plan allocation, given that it has so far been unable to resolve these issues to the highway authority’s satisfaction more than 15 months after a planning application was made.
- We support the proposal to seek developer contributions to the improvement of pedestrian links, the public realm in the village centre and the enhancement of public transport, but question the feasibility of delivering them, given the heavily constrained position along roads in the centre of the village. These are only “expectations” and the wording should be strengthened to become mandatory requirements (see above comments).
- We also support the draft Local Plan’s requirement for retention of hedgerows, a design which is sensitive to the edge-of-village location, and provision of on-site amenity/natural green space and children’s play facilities. These are essential if any development allocation is to be integrated successfully into the local environment.

**(c) Policy AL/HO2 Land south of Brenchley Road and west of Fromandez Drive**

- Our main concern with this proposed allocation remains the practicality of providing a safe pedestrian link between this site and the centre of the village, including pedestrian access to the shops, primary school, kindergarten, village hall, doctor’s surgery and pharmacy. Such a link is essential for any allocation on this site. The most obvious route is a continuous footway alongside Brenchley Road into the village centre, but this would require the acquisition of garden land from a large number of private frontages, making it impracticable. During discussions with KCC, following several significant accidents in the village, they have concluded that there is no feasible safe crossing point in the area.

Therefore, provision of a safe and continuous pedestrian access along Brenchley Road would not be feasible.

Instead, the draft Local Plan proposes a pedestrian link into the village centre via Fromandez Drive. This would require acquisition, and possibly demolition, of an existing bungalow there (and presumably reduce the ability of a developer to afford other necessary supporting infrastructure for the development). The Local Plan does not indicate where, and how, this would be achieved and this raises issues of whether such an approach is actually deliverable. The introduction of a large amount of pedestrian traffic, will change the character of what is now a very quiet cul-de-sac, particularly at the beginning and end of the school day. It would then bring pedestrians to another difficult road crossing at the village crossroads to get over to the school. We think the practicality of this proposal needs a re-think and begs questions about the suitability of this site for large scale housing development of 80-100 dwellings.

Even if a pedestrian route can be secured via Fromandez Drive, there is still a strong likelihood that residents of the new development would still be drawn to walk along Brenchley Road with potentially dangerous consequences (pedestrian desire lines are almost unstoppable in practice).

- If the above points are overridden and the allocation is confirmed, we support the policy's references to further reduce the speed limit to 20 mph and extend it out along Brenchley Road; provision of a buffer to protect the ancient woodland to the west of the site; protection of hedgerows on the site; reinforcement of landscaping on the southern boundary of the site; contributions to meeting biodiversity targets; safeguarding the setting of nearby heritage assets (including the conservation area and historic park and garden); and provision of on-site amenity/natural green space and children's play space. All of these are essential if the development is to be successfully integrated into the local environment.
- Given the difficulties of securing safe and convenient pedestrian access between the proposed allocation site and the centre of the village, we consider that this is not a suitable and sustainable site for a village hall, as it will encourage more short car journeys by people who do not wish to negotiate a difficult walking route.
- The contributions to transport infrastructure (public realm in village centre, other highways related works and measures to enhance bus travel) are all welcome, but again should be mandatory requirements rather than expectations (see comments above).

**(d) Policy AL/HO3 Land east of Horsmonden**

- This is the largest and most complex of the three allocations proposed in Horsmonden. As you know, we have engaged Locality/AECOM to undertake some master planning work on this site to explore the various issues arising from its possible future

development. In particular, our work is seeking to assess how development of this scale can be successfully integrated into the local environment and bring some real benefits for the local community. We held a local community workshop on it on 5 October and the work is now nearing completion. **Parish Council and Neighbourhood Plan Steering Group representatives are seeking an early meeting with TWBC planning officers to discuss this master planning work and its implications for policy AL/HO3. This has now been arranged for Friday 15 November.**

- Our master planning work, and feedback from the local community workshop, suggests that **achieving safe and convenient access to the site from Goudhurst Road remains an important, and as yet apparently unresolved, issue.** This matter is complicated by an existing outline planning permission for 30 dwellings (Ref: 15/505340/OUT) on the vacant farm storage buildings at the southern end of the site. We would like to hear more about TWBC discussions with KCC Highways on possible access arrangements. We do not think that the site should be allocated unless the access issue is resolved and the site is shown to be realistic and deliverable for an allocation of this scale.
- The integration of the site into the village is of paramount importance, both in terms of its impact on the landscape setting of Horsmonden and in terms of safe and convenient pedestrian links between the centre of the village and the site (particularly if it incorporates community facilities, such as an extended primary school and a new health centre/doctor's surgery). Again, this is part of the Neighbourhood Plan's master planning work, for future discussion with TWBC officers.
- If the allocation is confirmed, we support measures to protect the amenity of public rights of way; to protect the Hop Pickers Line route; an archaeological assessment prior to development and protection of any archaeological assets identified; reducing development densities on the outer parts of the site to assist its integration into the countryside; provision of on-site amenity natural/green space, children's play space and allotments; measures to respect the setting of Bassets Farm Cottages and other adjacent properties.
- The contributions to transport infrastructure (public realm in village centre, other highways related works and measures to enhance bus travel) are all welcome, but again are only expectations rather than requirements (see comments above).

### 3. Planning policies

- **Policy STR3- Master planning and use of CPO powers:** We consider that, if allocated, the land east of Horsmonden (AL/HO3) should be subject to a master planning requirement, in view of its size and sensitivity, and the mix of different uses. The Parish Council already has work in hand as part of its preparatory work on the Horsmonden



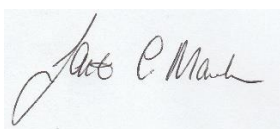
Neighbourhood Plan and its inclusion in STR3 would provide a suitable means of linking strategic and local planning policy.

- **Policy STR5- Essential Infrastructure and Connectivity:** We strongly support timely provision of upgraded infrastructure to support growth and the general thrust of this policy to achieve that end. However, the mildly worded “expectation” in the policy should be replaced by a “requirement” in order to reduce the scope for backsliding and leaving local communities to cope with the external impacts of growth on local infrastructure.
- **STR6 -Transport and Parking:** This policy is badly undermined by the “dispersed growth” strategy in the draft Local Plan. We are concerned that the central thrust of the transport strategy - reducing the need to travel - is negated by directing large amounts of new development to rural settlements with limited facilities and poor public transport, and making such development highly car dependent. This is contrary to NPPF paragraphs 102 and 103.
- **STR7-Place shaping and design:** we strongly support policies to deliver development which reflects, and responds to, the distinctive local character of our parish, and avoids bland “anywhere” designs.
- **STR8 Conserving and enhancing the natural, built and historic environment:** Subject to the concerns raised above about AONB/non AONB landscapes expressed above, we strongly support policies to protect the natural, built and historic environment.
- **STR9 -Neighbourhood plans:** We support this policy for support to town and parish councils preparing neighbourhood plans and the weight to be afforded to neighbourhood plans in planning decisions.
- **STR10 -Limits to Built Development:** we support the continuing definition of “limits to built development” for Horsmonden as a means of maintaining a compact and “walkable” village and protecting the surrounding countryside from the outward sprawl of development.
- **Policy EN2- Sustainable design and construction:** Whilst we strongly welcome most elements of this policy, it is once again undermined by the “dispersed growth” strategy which directs development to rural settlements with a high degree of car dependency. The first and second elements of this policy are, in effect, at odds with the overall development strategy advocated in the draft Local Plan.
- **Policies EN2-32 (Environment and Design, Natural Environment, Air, Water, Noise and Land)** We are generally supportive of these policies to protect and enhance important aspects of the local environment, when considering planning applications.
- **Policy EN11 for net biodiversity gain** is welcomed but, in effect, “jumps the gun” on a forthcoming national requirement for a demonstrable 10% increase in biodiversity value in all future planning applications. The policy will need to be reviewed as and when national requirements emerge.

- However, in **Policy EN21 on the High Weald AONB**, land immediately beyond AONB boundaries also needs to be considered in terms of its unique and intrinsic character and qualities, rather than solely as an appendage to the AONB.
- **Policy H3-Housing Mix:** We welcome the specific **reference** to neighbourhood plans having the ability to indicate the appropriate size and mix of housing on development sites, but would welcome a better link through policy STR/HO1 (see above comments).
- **Policy H5-Affordable Housing:** We strongly welcome this policy with its intention to deliver a significant measure of affordable housing on larger housing developments and the prominence given to local connections in allocating housing provided in this way. However, we would be very concerned if developer viability assessments led to affordable housing being squeezed out by the cost of providing physical infrastructure.
- **Policy H7-Rural Exception Sites:** We support this policy as an exceptional means of providing housing specifically to meet local needs in a rural settlement, and the stringent conditions applied to the scrutiny and approval of such cases, where they are on sites beyond the “limits to built development”.
- **Policy ED3- Digital Communications and Fibre to the Premises (FTTP):** We support this policy in promoting FTTP in larger scale developments proposed in the draft Local Plan. The quality of digital communications is currently a big issue for local businesses in Horsmonden. However, we are disappointed to see that the ambition to provide the highest level of connection to all properties - which applies to the towns and the proposed new settlement at Tudeley - falls short of Horsmonden (but not Pembury, which is being asked to accommodate a similar level of new development to Horsmonden).
- **PolicyTP3- Parking standards:** We welcome this policy’s introduction of higher parking standards for housing development in rural areas, including the provision of electric vehicle charging points. In the past, KCC standards have under-provided parking, resulting in increased pressure for on-street parking, more congestion for traffic, and road safety problems.
- **Policy TP5: Safeguarding Railway Land** - We strongly support the policy to safeguard the former Paddock Wood to Hawkhurst railway line (The Hop Pickers Line) as a green infrastructure corridor.

Thank you once again for the opportunity to comment. I trust we can pick up any matters arising from these comments when we meet.

Yours sincerely



**Jane March (Chairperson Horsmonden Parish Council)**