WEALDEN DISTRICT (INCORPORATING PART OF THE SOUTH DOWNS NATIONAL PARK) CORE STRATEGY (CS) DEVELOPMENT PLAN DOCUMENT (DPD)

LDF EXAMINATION

Matter 11 – Strategic Development Area in the Parish of Frant (WCS4)

STATEMENT PREPARED BY:

WOOLF BOND PLANNING LLP

CHARTERED TOWN PLANNING CONSULTANTS

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Matter 11 – Strategic Development Area in the Parish of Frant (WCS4)

1.1. This submission has been prepared on behalf of our clients, Messrs Trustees of J. O. Edmonton Will Trust. Our clients have a controlling interest in the site edged red on the attached site location plan (no. WBP1), extending to approximately 6.1ha.

1.2. Our clients support the inclusion of the land adjacent to the Tunbridge Wells Borough boundary (within Frant Parish) as a strategic development area (SD12).

1.3. Separate but related objections have been submitted in response to Matter 1, the content of which is relevant to our representations below. The matters listed by the Inspector for consideration at the inquiry are dealt with below having regard to the tests of soundness.

a) Is SD12 compatible with planning policy for Tunbridge Wells?

1.4. The South East Plan (SEP) acknowledges Tunbridge Wells role as a regional hub acting as a significant economic and service centre within the wider sub-region. SD12 provides a logical housing development area, well related to a number of employment opportunities within Tunbridge Wells, accessible from bus routes running along Benhall Mill Road. There are no provisions within the Tunbridge Wells Borough Local Development Framework Core Strategy that conflict with the notion of housing development at the proposed SD.

1.5. SD12 offers a highly sustainable location given its proximity to the major settlement of Tunbridge Wells. This approach is entirely in accordance with the provisions of the SEP that provides for development crossing administrative boundaries in support of major locations for growth in the region. The need for the continued consideration of cross-boundary issues is affirmed in the July 2011 National Planning Policy Framework (NPPF).

b) Is there a clear audit trail showing how and why the SDA was arrived at?

1.6. We consider there to be a robust evidence base underpinning the specific allocation of SD12.

c) Have the infrastructure implications of SD12 clearly been identified and supported by the evidence base? Is it clear who is going to deliver the required infrastructure and by when?

1.7. As provided within BP11 (Infrastructure Delivery Plan), the delivery of SD12 is reliant upon the service provider OFWAT providing additional waste water treatment works capacity for a further 200 new dwellings. BP11 however finds that such capacity may be in place post 2017 and upon delivery would further increase the scope for additional growth in Frant Parish. It is acknowledged that there is a need for additional educational capacity within the area; however this could be covered in the form of a section 106 obligation negotiated at the application stage. It is therefore considered that SD12 could come forward for development substantively earlier than scheduled in Figure 5 of the CS and as such the proposed SD provides a deliverable housing opportunity within the coming ten years. The notion that the site is only deliverable from 2026 onward is unjustified when the infrastructure requirements in BP11 are considered and in turn the phasing strategy proposed for its delivery is not sufficiently justified in regard to maximising housing delivery in this sustainable location. We therefore propose the following change:

- ***Figure 5 to phase SD12 to start delivering units from 2017 (or earlier if necessary infrastructure is available).***

d) Is the strategy sufficiently flexible to respond to an unexpected change in circumstances?

1.8. As discussed above, it is considered that Figure 5 is inflexible in so far as phasing SD12 for delivery post 2026, clearly this is dependent on infrastructure delivery. This leads to the CS being inflexible given there is an apparent and pressing need for both market and affordable housing within Frant Parish. Only 46 dwellings were completed in Frant Parish over the first four years of the plan period (2006 to 2010). This is equivalent to only 11.5 dwellings per annum.

1.9. Policy WCS2 identifies that as at 1 April 2010; there were a total of 53 dwellings built or already committed adjacent to the Tunbridge Wells boundary (within Frant Parish). Appendix 8 of BP2 (Managing the delivery of

Housing) adds further clarity, identifying that there were 7 commitments (sites with permission) in Frant Parish as at the base date. Further Appendix 3 identifies that of the 7 commitments, none are affordable and in addition Appendix 2 identifies a gross need for 14 affordable dwellings per annum in Frant Parish.

1.10. Policy WCS6 (Rural Areas Strategy) states that the Delivery and Site Allocations DPD will allocate 20 net additional dwellings within Frant Parish in addition to the proposed strategic housing allocation adjacent to Tunbridge Wells (SD12).

1.11. Even if a material number of the 20 proposed units were to come forward as affordable completions, there would remain an acute shortfall in affordable housing provision to meet identified needs in this part of the District through to the delivery of the SD12 allocation, given the need for 14 affordable units per annum (provided within Appendix 2).

1.12. Without additional housing allocations, the supply of affordable housing in Frant Parish will not improve in the short to medium term. The proposed "SD12" allocation is therefore critical to meeting the identified need for affordable housing supply within this part of the District. As per our statements concerning questions (c) and (f), there is a need to build in flexibility to the CS to allow for earlier delivery of the SD and recognise it could deliver a level of development beyond the 120 units provided for in Policy WCS2.

e) Is there appropriate justification for the phasing of housing at SD12 from 2026?

1.13. As set out in our representations concerning question (c) above, the CS should build in greater flexibility to allow for early delivery of the SD dependent on infrastructure delivery.

f) Have reasonable alternatives to SD12 been considered – omission sites?

1.14. The site under our clients control is edged red on the attached site location plan (no. WBP1) and extends to approximately 7.2ha. The site comprises in part a former landfill site. This is a known constraint and the land has been

allocated by the LPA in full knowledge of the need to address both structural and land contamination issues as and when the site is released for development. Ashdown Site Investigations Ltd. have prepared reports on the matter including identifying the extent and depth of the topped area and establishing a protocol for enabling construction partly on the topped area together with the remaining untipped land. Further whilst there would be additional costs in preparing the land for development it is not envisaged that this would render the development unviable.

1.15. The site is sufficiently large to accommodate the amount of housing proposed in Policy SD12.

1.16. The site provides an opportunity to meet the identified housing requirement in this part of the District, outside of the designated High Weald Area of Outstanding Natural Beauty (AONB), which offers a significant constraint over much of North Wealden. The subject site offers a high degree of sustainability, given its close proximity to the large town of Tunbridge Wells.

1.17. The merits of the site as a housing allocation are summarised below:

- The site is in a sustainable location, outside the High Weald AONB and adjoining the settlement of Tunbridge Wells.
- A scheme could deliver 192 dwellings, including much needed open market and affordable housing in this part of the District.
- A material amount of Public Open Space can be provided as part of the masterplan proposals for the site, to the benefit of the wider area generally.
- Impact on landscape character will be limited due to the enclosure provided by the mature trees on the site's boundaries.
- The site lies within Flood Zone 1 and development of the site for housing would be in accordance with the requirements at PPS25.

1.18. A greater level of development should therefore be proposed in the town/settlement - Adjacent to Tunbridge Wells boundary (within Frant boundary), to address the identified shortfall in affordable housing provision. The overall housing requirement to be met at land adjacent to Tunbridge Wells boundary (within Frant Parish) should be increased in line with our separate but related objections set out in response to Policy WCS1. This

point is supported by our representations on Matter 3 (Housing) that consider that the overall level of housing provision proposed on a District wide basis is flawed and fails to be legally compliant.

1.19. The need set out within that representation could be partly served through the allocation of development for a greater number of units at the proposed SD12 allocation.

1.20. We support the broad housing allocation adjoining Tunbridge Wells (within Frant Parish) as SD12. However on the basis of the above we recommend the following change to meet a greater strategic housing requirement and recognise the full potential of our clients' site:

- ***Policy WCS2 to allocate SD12 for the provision of 192 dwellings.***

Suggested changes to make CS Sound

1.21. We propose the following changes to the CS to ensure it meets the tests of soundness set out within PPS12, to ensure it is sufficiently flexible and effective in meeting local and district wide housing requirements.

- ***Figure 5 to phase SD12 to start delivering units from 2017.***
- ***Policy WCS2 to allocate SD12 for the provision of 192 dwellings.***