Matter 11 /WDC

Wealden District (Incorporating part of the South Downs National Park)

Core Strategy Hearing

Matter 11: Strategic Development Area in the Parish of Frant - Statement by WDC/ SDNPA

December 2011

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

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

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

1.1 The Tunbridge Wells Core Strategy aims to focus development in and around the main urban areas within the Borough and, in particular Tunbridge Wells. This is reflected in Strategic Objectives SO1 and SO2 of the Tunbridge Wells adopted Core Strategy. Strategic Objective SO1 includes the objective to locate development "sustainably in and around existing settlements, and to conserve and enhance the Borough's high-quality built and natural environment". The second strategic objective of the Tunbridge Wells Core Strategy refers to development being focussed at Tunbridge Wells in order to stimulate the local economy as a Regional Hub.

1.2 The proposed development at SDA 12 therefore has a strong synergy and alignment with these objectives. It also appears to have a strong synergy with the Tunbridge Wells Core Strategy's spatial strategy which includes an approach to "focus the majority of new development at Royal Tunbridge Wells and Southborough to support the Regional Hub role with Tonbridge, while improving access to, from and within it".

1.3 A number of the principles contained within the Core Policies of the Tunbridge Wells Core Strategy are also relevant to consideration of this matter.

1.4 Core Policy 1 of the Tunbridge Wells Core Strategy states, in relation to locating new development, that priority will firstly be given to previously developed land within built up area boundaries. This policy goes on to state that "selected greenfield sites within and/or adjacent to the LBD[1] of settlements in the main urban area and small towns will also be allocated and released as appropriate to maintain a sufficient phased supply of deliverable and developable land."

[1] The term LBD refers to the limit of built development

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1.5 Core Policy 3 states that sustainable modes of transport will be encouraged (including public transport) and that encouragement will be given to improvements in public transport. This aim to promote public transport use is also stated within Core Policy 9. In respect of SDA 12 proposed in Wealden's core strategy this location already benefits from a direct bus service to Tunbridge Wells town centre. It is further noted that the suggested guiding principles for this SDA, as contained within the draft Strategic Sites Issues and Options consultation paper (approved for consultation purposes Nov 2011), includes the requirement for improved linkage between the development and town centre facilities through more frequent bus services, with extended operating hours and improved bus stopping and turning facilities.

1.6 Core Policy 4 in the Tunbridge Wells Core Strategy, and the accompanying text, make it clear that a very high priority is given to protection of the High Weald Area of Outstanding Natural Beauty and, in this respect, the proposed development at SDA 12 would not conflict with this objective but assists in meeting this aim.

1.7 Key Strategic Objectives SO1, particularly SO2 (to focus development at Tunbridge Wells) support the proposed SDA12. Further the Tunbridge Wells Core Strategy at highlighted Box 3 entitled Spatial strategy promotes and urban focus for development and Box 4 entitled Settlement Hierarchy further emphasises this approach.

1.8 In summary, the National Park and the District Council conclude that the location of SDA 12 is compatible with planning policy and principles contained within the Tunbridge Wells Core Strategy. It is sustainably located adjacent to the LBD at Tunbridge Wells and development at this location does not conflict with the Strategy's aim to protect the High Weald AONB (Core Policy4). The location is already served by public transport links to the town of Tunbridge Wells with the opportunity to secure improvements to existing services.

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

2.1 The 2007 Issues and Options consultation document looked at and consulted upon the opportunity for development within Wealden but on the edge of Tunbridge Wells. Paragraph 5.22 of that document explains that whilst development north of the railway was not considered possible the land at Benhall Mill Road, which lies outside of the designated High Weald AONB might be possible .An accompanying table 4 set out some of the main implications of progressing this option and the consultation document sought views. It was noted within this table entitled "main option for development on the fringe of Tunbridge Wells" that there was good potential access and limited landscape impact but also that some input from service providers e.g. Kent County Council re transport matters would be required . The broad location being considered was shown on figure 16 of the 2007 consultation.

2.2 Within the six possible options for distribution of housing growth that were subject of the 2009 consultation a number of these options proposed reasonable growth within the parish of Frant to reflect the opportunity for growth outlined in the 2007 consultation. The land under consideration was not, of itself, so large as to suggest any spatial option focussed upon this area (as in this general location there is just the one option) and the six spatial housing options considered were principally aimed at the larger potential that was seen on the edges of towns lying within Wealden.

2.3 From our published SHLAA a number of parcels of land were put forward within the parish of Frant and this broad area, identified as SD12 within Policy WCS4 of the proposed submission Core Strategy was deemed to be suitable and deliverable. At page 61 of the proposed submission BP1 document we confirmed that due to this high degree of sustainability, and the need to meet housing needs in the wider area, the area is considered suitable for growth. At paragraph 8.60 of Background Paper 1 Development of the Core Strategy we identify this area as lying outside of the High Weald AONB which otherwise offers a significant constraint over much of north Wealden. Although initially considered under the rural settlement hierarchy the potential for development adjacent to Tunbridge Wells, albeit within Frant Parish is in effect an urban extension of that particularly sustainable town. Based upon SHLAA information and subsequent correspondence from agents acting in respect of part of this land we consider this an appropriate selection for SDA reference.

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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 whom?

3.1 Submitted Background Paper 1 (paragraph 8.72) acknowledges that although some representations have been received stating that this area is far too remote from Wealden settlements this seeks to deny the obvious and close relationship with Tunbridge Wells. It is considered that the development can meet wider housing needs on the edge of a sustainable centre. Infrastructure dependence on Tunbridge Wells and Kent is acknowledged as a cross boundary resource issue.

3.2 Our submitted Infrastructure Delivery Plan BP11 (ref. A25) sets out clearly at pages 42 and 43 the critical and key infrastructure requirements to support growth on the edge of Tunbridge Wells/ Frant. This information has been provided to us by the relevant infrastructure partners and as part of our continuing work on the IDP. This has included inputs from KCC in respect of transport improvements and also from Southern Water in respect of waste water.

3.3 The landowner/agent in respect of SD12 is fully aware of these requirements and their potential to impact upon delivery however we do not see any fundamental reason for this development not to proceed .We have acknowledged through our anticipated timetable for delivery the various matters that would need to be overcome to enable development to come forward. There are no major constraints in respect of transport but some local improvements will be required. ESCC has confirmed in respect of education facilities that the provision outlined in the IDP tables may require adjustment. Over and above those referred to above there are no other infrastructure requirements identified and we therefore consider that all of the necessary requirements for infrastructure and responsibility for delivery are clear.

3.4 As part of the work upon development of our Strategic Sites Development Plan Document (SSDPD) we will be seeking to clarify the detail of any infrastructure requirements associated with development of this land. This draft SSDPD was approved for public consultation in November 2011 and the Council anticipates that the consultation period will commence in mid January.

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D) Is the strategy sufficiently flexible to respond to an unexpected change of circumstance?

4.1 As set out in response to the issues raised by the Inspector at Matter 1 (E) the council considers that it's core strategy is sufficiently flexible. Any risk of non delivery here is low and in any case of a level that would not prejudice the delivery of the overall strategy.

4.2 In respect of the delivery of the level of houses (c 120 units) identified within WCS2 - distribution of housing growth the Council is confident on the evidence available to it from landowners and agents, including responses from Kent County Council in respect of transport matters, that the SDA can be delivered.

4.3 Indeed, since production of the proposed submission core strategy additional land has been put forward within the broad area of the SDA for consideration under SHLAA. The addition of this land, which has been assessed as SHLAA suitable, may indeed afford greater scope for necessary access improvements and compensate for any part of the land/ SDA that may not be able to be developed due to its former use as a brickworks. The Council is required to keep its SHLAA under review and this is accordingly maintained as a "live" document and whereby changes in circumstance can be accommodated.

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

5.1 As detailed above we are aware that there will be cross boundary / cross border infrastructure requirements and matters that need addressing before this site can come forward.

5.2 We have identified the ESCC response in respect of education, and that of KCC in respect of Highways matters. Our Infrastructure Delivery Plan has also highlighted that there are waste water capacity issues that may need addressing. On the evidence that we currently have available to us we therefore consider that the phasing of the site as indicated is reasonable. Our experience would suggest that these matters, especially where cross border issues are involved, may take some while to resolve and agree timetables for implementation.

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5.3 Within the representations received from TW Borough Council it is suggested that KCC should first be consulted as Highways Authority before allocating this land as an SDA. We can confirm that they have been and their comments in respect of contributions to any necessary but local highways infrastructure are known to the landowners concerned. This does however underline the greater timescales involved in agreeing matters in such situations.

5.4 We are already well advanced in progressing work on our Strategic Sites DPD which has now been agreed to be published for public consultation (under Regulation 25) in January 2012. Should the information and evidence that comes forward from the development of this particular DPD suggest that the land may be able to be phased earlier then this can be accommodated through this process.

F) have reasonable alternatives to SD12 been considered - omission sites?

6.1 SDA 12 will enable a relatively modest amount of housing growth to be delivered when compared to other SDAs within the Core Strategy (e.g. Hailsham 1300 units, Uckfield 1,000 units) and it is for this reason that there are not, within this strategic document for example an Area Strategy or town objectives as is the case for the other Town based SDAs and where sustainable urban extensions is a key element of the overall approach which we have adopted - as strongly encouraged and supported by the Regional Strategy.

6.2 With regards to looking at reasonable alternatives to SDA12, as sustainable urban extensions to the Town of Tunbridge Wells most of this task would fall to Tunbridge Wells Borough Council as part of developing their own Core Strategy. Within Wealden only a limited part of the perimeter of Tunbridge Wells can fall to be considered in this fashion as part of a Core Strategy for Wealden District. We are of course aware of the work of Tunbridge Wells and indeed their recent ongoing review of their own Core Strategy which at Core Policy 1 would appear to support the approach taken in respect of SDA12.

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6.3 However in looking at "reasonable alternatives" and omission sites to the prospect of other extensions to the town, on land within Wealden District, as part of our SHLAA process we are able to confirm that additional and reasonably significant areas of land were submitted for consideration to the south Of Tunbridge Wells and lying adjacent to the A26. WDC (Published SHLAA site references 443/1610, 446/1610 and 504/1610).We have not chosen these because of their high landscape visibility and High weald AONB location. In looking at other possible omission sites we are also aware of submitted land in the vicinity of SDA12 (SHLAA reference 063/1610) but which we have chosen not to select owing to its nature conservation interest and value. We consider this entirely consistent with RS Policy NRM5 (see general Policy and criterion (iv)) and our proposed Policy WCS 12 Biodiversity.

6.4 As part of the assessment of SHLAA submitted land and from other evidence these parcels were not felt to be suitable as possible areas for housing owing to their High Weald AONB location, their high degree of visibility within the landscape, their intrinsic nature conservation value, and their proximity to a major nature conservation site (RSPB reserve at Hargate Forest).

6.5 As emphasised this relatively modest amount of growth proposed at SDA12 has not been seen as of such a scale as to warrant development of a specific area strategy as set out in other SDAs and thus any alternatives have not been assessed against any such strategy.

6.6 However we have, through our SHLAA, our consultation and our weighing of evidence considered but ultimately rejected other alternatives that were put forward in respect of land and growth adjacent to the built up area of the Town of Tunbridge Wells but located within Wealden District.

6.7 We are aware that the owners/ agents for some of this land have suggested that the land alongside the A26 (Eridge road) might be a contingency site as a readily available alternative to the "urban extension" to Tunbridge Wells (SDA12).However the reasons for rejecting this land as suitable under the SHLAA would still remain.

6.8 We are also not aware from any of the discussions or correspondence with the agents concerned that the land at SDA12 cannot be delivered. Indeed (as mentioned at D above) the Council has now had a small additional parcel of land formally submitted under SHLAA which adjoins SDA12 and which may actually afford some greater ease of delivery here.