

Horsmonden Parish Council’s Response to the Public Consultation on Tunbridge Wells Borough Council’s Response to the Inspector’s Initial Findings Letter on the Examination of the New Local Plan

The consultation states:

“The proposed Revised Development Strategy and full response to the Inspector’s Initial Findings Letter is set out in the [Development Strategy Topic Paper Addendum](#) [PS_054]”

This Local Plan Development Strategy Topic Paper – Addendum. January 2024, is largely concerned with developments for Tudely and Paddock Wood, but at paragraph 13.1, the report refers to housing allocations for Horsmonden and states:

“Table 4 of the SLP, which sets out the proposed allocations, can also be updated. In doing so, attention is drawn to the following:

[Bullet 4] “The slightly lower figure for Horsmonden relates to the capacity of a site which was agreed by the Council to be somewhat lower than in the SLP, as discussed at the relevant hearing session last year, and following the submission and consideration of planning application reference 22/00296/outline for village hall and a residential development of up to 68 dwellings and associated infrastructure (which members of the Council’s planning committee have resolved to grant, subject to completion of a S106 legal agreement)”

Table 1 below shows the breakdown of the SLP allocations for Horsmonden and the adjustment as referenced in the Development Strategy Topic Paper – Addendum.

| Table 1. Horsmonden Housing Allocation - Submission Local Plan Revisions: | | | | |
|--|----------------|----------------|-----------------|---|
| 1. Submission Local Plan: | | | | |
| | SLP Low | SLP Mid | SLP High | |
| AL/HO1 - Land adjact to Gibbet Lane | 45 | 50 | 55 | |
| AL/HO2 - Land South of Brenchley Road | 80 | 90 | 100 | |
| AL/HO3 - Land East of Horsmomnden | 115 | 140 | 165 | |
| Total Allocation for Horsmonden | 240 | 280 | 320 | SLP Table 4 - Distribution of Housing Allocations |
| 2. Summary of Proposed Modifications to the Development Strategy, following Inspector’s Initial Findings Letter. January 2024 | | | | |
| | SLP Low | SLP Mid | SLP High | |
| AL/HO1 - Land adjact to Gibbet Lane | 45 | 50 | 55 | |
| AL/HO2 - Land South of Brenchley Road | 70 | 70 | 70 | Local Plan Development Strategy Topic Paper – Addendum. 13.0 Updated housing land supply 13.1 Bullet 4. |
| AL/HO3 - Land East of Horsmomnden | 115 | 140 | 165 | |
| Proposad Total Allocation for Horsmonden | 230 | 260 | 290 | SLP Table 4 - Distribution of Housing Allocations Revised |

However, details for each of the 3 allocated sites have progressed over time, and the proposed revision to SLP Table 4 does not acknowledge or reflect these correctly.

AL/HO1 – Land adjacent to Gibbet Lane:

Development of this site has been completed with 49 houses.

AL/HO2 – Land South of Brenchley Road:

As stated in the Development Strategy Topic Paper – Addendum, this development has been granted outline planning permission for 68 houses, not 70.

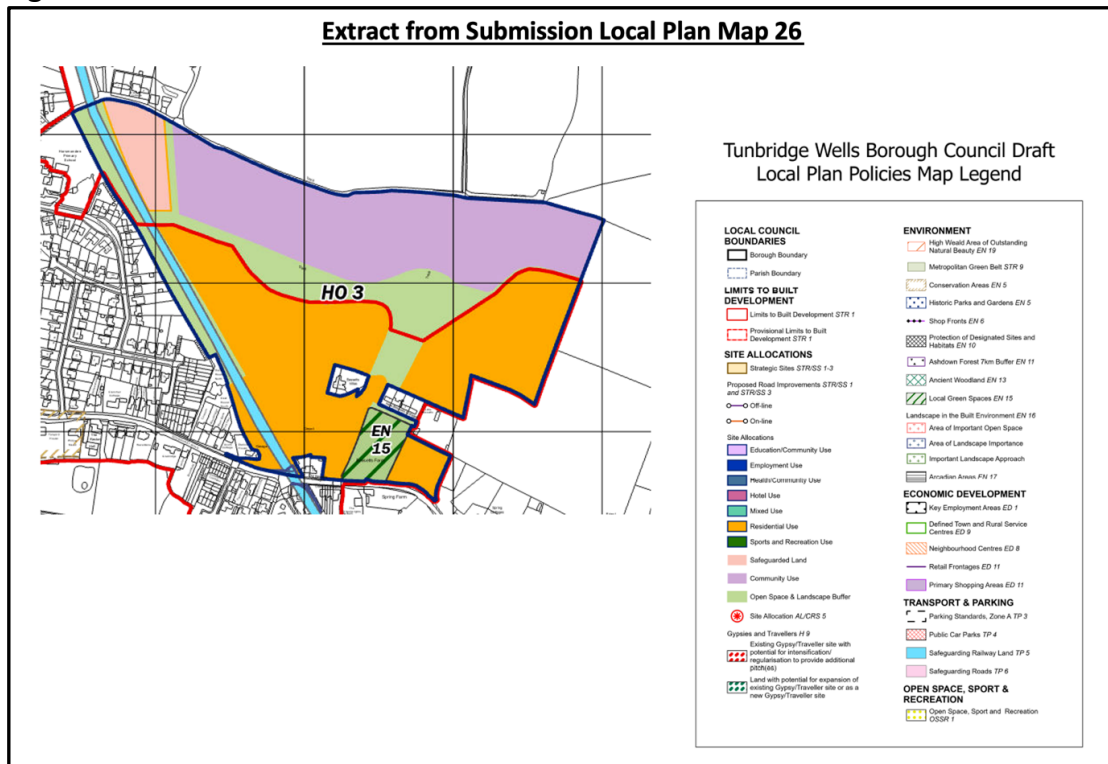
AL/HO3 – Land East of Horsmonden:

The following statements are based on an evidence report (TWBC Submission Local Plan Allocation AL_HO3 181223 vPC-F) (**Evidence Report**) adopted by the Horsmonden Parish Council on 19-December 2023. This report summarises evidence relating to SLP Allocation Policy AL/HO3 as at November 2023. The Evidence Report is attached for reference. This representation draws on the Evidence Report and any more recent information.

Contrary to what was stated by TWBC to the Inspector (Matter 7. Issue 13. Question 6. Para 47), the whole of this site is not being promoted by a single developer and the following now need to be taken into account by TWBC in their housing and trajectory plans:

1. AL/HO3 is a combination of 5 different sites, 4 were offered during the SHELAA process, the other is a southerly plot consented for 20 houses (15/505340/OUT & 19/03657/REM). The construction of these 20 houses is now underway and this site has effectively been withdrawn from the AL/HO3 allocation.
2. Based on multiple Landscape and Visual Impact Assessments (LVIA), consultations, in depth reviews by TWBC specialist officers, and examination by a government Inspector, the AL/HO3 site is divided by a new LBD running West-East (red line) as per SLP Policy STR 1. The southerly part includes (orange) areas allocated for residential development and a doctors’ surgery/medical centre. The northerly part, and a traditional orchard to the south, are designated as green open space and landscape buffers for community use. There is also some open space on either side of the North-South PRow. This is shown in **Figure 1** below, an extract of AL/HO3 from SLP Map 26:

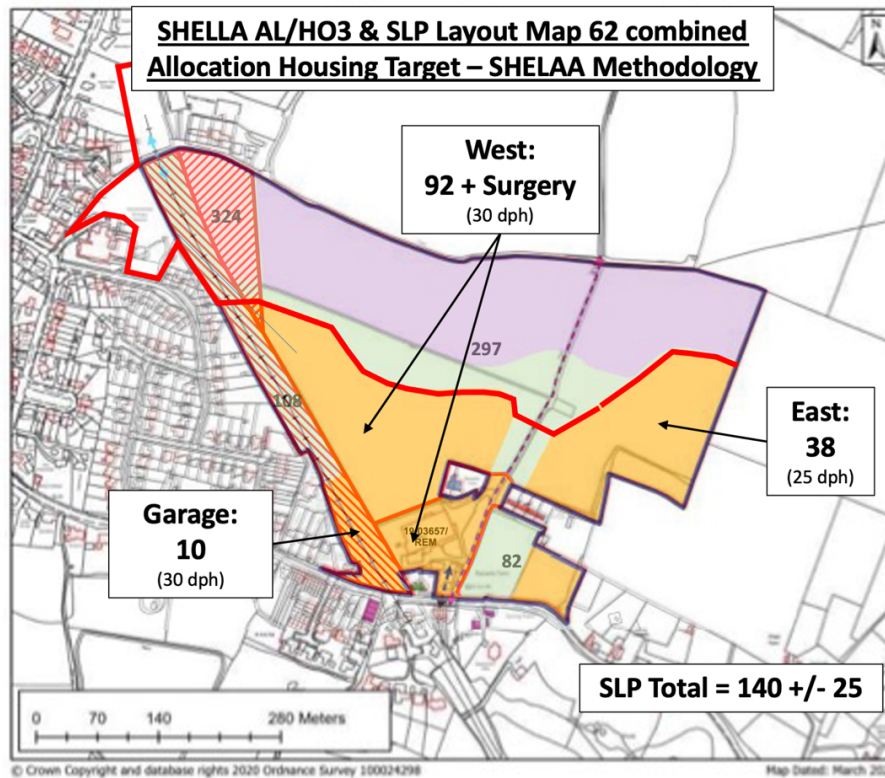
Figure 1



3. Landscape and Visual Impact evidence used by TWBC in defining the Horsmonden LBD and the development of Allocation Policy AL/HO3 on Land East of Horsmonden, is strong for the West Site. This includes a Landscape Sensitivity Assessment and an AONB Setting Analysis as referenced by TWBC to the SLP Inspector (Matter 7, Issue 13. Question 6). It is however acknowledged in policy AL/HO3 (Condition 8) that further consideration is needed for the East Site, and this was also addressed with the SLP Inspector (Matter 7. Issues 13. Question 10).
4. The adopted Horsmonden Neighbourhood Plan (HNP) specifies the same LBD as the SLP and the HNP has adopted this LBD as its acceptable development limit (HNP Policy 2.1 and Figure 5). The fixing of a new LBD in the HNP ahead of the adoption of a new Local Plan was questioned by and then confirmed by the HNP Examiner. This point was also confirmed by TWBC officers in a discussion with Parish Councilors which took place after the successful HNP referendum.
5. SHELAA sites 108 and 324 are not under the control of the developer. These sites include some of the (orange) land allocated for residential use, and (pink) land allocated for expansion of the school, as per SLP Map 26. Policy AL/HO3 Condition 12 requires the school land to be safeguarded for future school expansion as part of the overall development, but if this land cannot be guaranteed to be available as and when it is required for expansion of the school, then the infrastructure development provisions for AL/HO3, and indeed the whole allocation strategy for Horsmonden, are compromised.
6. Policy AL/HO3 Condition 4 states: *“Residential development shall be located on the areas identified for residential **and doctors surgery** use on the site layout plan, with the exact location of the surgery to be determined having regard to accessibility to the main village and services, and landscape impact”*. This condition requires the doctors’ surgery to be located on the (orange) land for residential development within the LBD on SLP Map 26. The inclusion of the doctors’ surgery/medical centre within the orange area on Maps 26/62 is also consistent with the allocation calculations shown in 8. below. Locating the doctors’ surgery within the LBD is also specified in the HNP (HNP Figure 5).
7. The SLP examination also addressed Heritage Assets including Bassetts Villas which are Non-Designated Heritage Assets surrounded by the AL/HO3 development site (Matter 7. Issue 13. Question 6. Para 62). TWBC concludes (Question 6. Para 68) that: *“The Council is confident that effects on heritage assets can be dealt with adequately through a planning application and that the site specific policy and supporting map give added confidence that the effects, which are likely to be limited can be minimised to an acceptable level”*.
8. Policy AL/HO3 allocates a housing target range of 115 to 165 dwellings. This is stated in the SHELAA report as 140 dwellings to which a range of +/- 25 has been applied. We have reviewed the TWBC SHELAA methodology for determining this figure of 140 houses. It uses a standard reference density of 30 dwellings per hectare for the orange residential development areas on SLP Map 26 and AL/HO3 Layout Map 62 and allows for buffers and land for the doctors’ surgery, except for the East Site which has a lower density of 25 dph applied. Maps 26 and 62 are the same except Map 62 does not include the new LBD, nor the Hop Pickers’ Line which is protected under AL/HO3 Condition 5 and SLP Policy TP5.

9. The following map, **Figure 2**, combines SLP Maps 26/62 together with the SHELAA sites maps and shows the derivation of the AL/HO3 allocation at 140 houses. **Appendix 1** shows the detailed calculation of the SLP AL/HO3 housing allocation.

Figure 2



10. However, the AL/HO3 allocation and TWBC Document PS_062 “Updated Local Plan Housing Trajectory – 1 April 2023 Position”, which is also part of this consultation, need to be revised to take account of the following information:
- Old Station Garage** (10 allocated houses +/- 2), is not currently being promoted and needs to be considered separately. The allocation of houses on land either side of the protected heritage Hop Picker’s Lane is highly questionable, and any development is very unlikely to take place in the near term.
 - Concerns about the **East Site** landscape sensitivity as mentioned in point 3 above have now been acknowledged by the developer in further Landscape and Visual Impact Assessment (LVIA) work and the area and housing density have been reduced to mitigate these concerns. This East site has been reduced from the SHELAA allocation of 38 to 22 houses. (A reduction of 16 +/- 4).
 - TWBC recently reconfirmed the **Non-Designated Heritage Asset** status of Bassetts Villas which is surrounded by the AL/HO3 site. Allowance needs to be made for the setting and amenity of Bassetts Villas and an allowance reduction of 5 houses +/- 1 would seem appropriate.
11. The AL/HO3 allocation housing target at standard housing densities is thus:

AL/HO3 development within the next 10 years:

- Consented Brownfield Site on Goudhurst Road (15/505340/OUT & 19/03657/REM):

20 houses

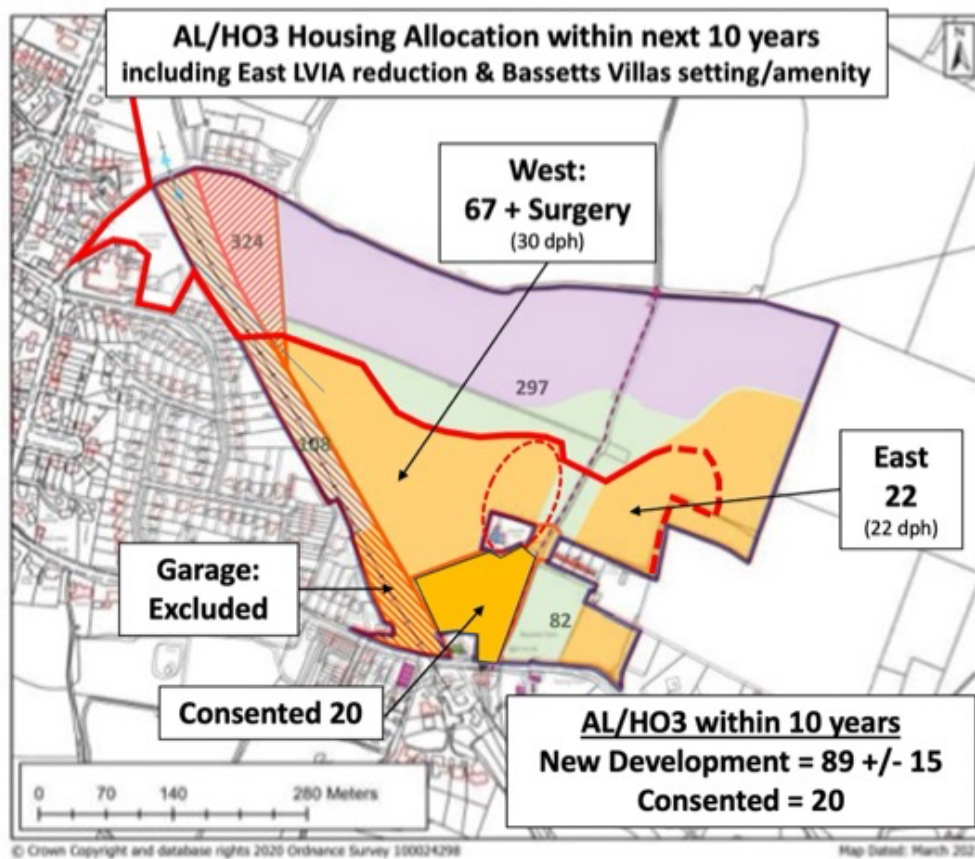
| | |
|---|------------------|
| 2. New allocated development: | 120 reduced by |
| Old Station Garage part of SHELAA site 108: | (10) |
| East Site LVIA revision: | (16) |
| Bassetts Villas NDHA setting allowance: | (5) |
| New Development on SHELAA sites 297 and 82 | 89 houses |

AL/HO3 development likely to be beyond the next 10 years (subject to Hop Pickers' Line protections):

| | |
|--|------------------|
| 3. Old Station Garage part of SHELAA site 108: | 10 houses |
|--|------------------|

Figure 3 shows the AL/HO3 housing allocation within the next 10 years:

Figure 3:



12. **Table 2** below summarises all the above changes that have taken place in relation to the SLP allocations for Horsmondon. **It shows that an up-to-date overall housing allocation for Horsmondon in SLP Table 4 should be 215 to 259.**

Table 2

| Table 2. Further Modifications Required to SLP Table 4. | | | | |
|---|------------|---|------------|--|
| | SLP Low | SLP Mid | SLP High | |
| AL/HO1 - Land adjact to Gibbet Lane | 45 | 50 | 55 | |
| | 4 | (1) | (6) | Correction not made in SLP Modifications |
| | 49 | 49 | 49 | As built |
| AL/HO2 - Land South of Brenchley Road | 70 | 70 | 70 | |
| | (2) | (2) | (2) | Outline Planning 22/00296/OUT granted for 68 |
| | 68 | 68 | 68 | As per Updated Local Plan Housing Trajectory. December 2023 |
| AL/HO3 - Land East of Horsmomnden | 115 | 140 | 165 | |
| Persimmon Homes Site Corrections | (8) | (10) | (12) | Remove Old Station Garage |
| | (16) | (20) | (24) | Remove consented Brownfield site |
| | (13) | (16) | (19) | Adjust for Eastern LVIA reduction 38 to 22 =(16) |
| | (4) | (5) | (6) | Adjust for Bassetts Villas NDHA |
| Persimmon HO3 site target excl brownfield | 74 | 89 | 104 | As per SLP methodology |
| | | ** Updated Local Plan Housing Trajectory. December 2023 shows 120. (50 in 26/27 & 70 in 27/28) - Should be 89 | | |
| Persimmon consented B'Field site | 20 | 20 | 20 | 20 consented houses under construction Jan-24 |
| Total revised target for Persimmon site | 94 | 109 | 124 | |
| Old Station Garage (part of AL/HO3) | 8 | 10 | 12 | Add back for potential future infill - unlikely in next 10 years |
| Adjusted Total Allocation for Horsmondon | 215 | 237 | 259 | |

13. Document PS_062 Updated Local Plan Housing Trajectory (December 2023), referenced in this consultation, shows developments at AL/HO2 and AL/HO3 both taking place between 2026 and 2028 (with the consented 20 houses at AL/HO3 being completed earlier than this). This is a change for AL/HO3 which was projected to take place between 2030 and 2032 in the previous version of the Local Plan Housing Trajectory (February 2021) used in discussions with the SLP Inspector in 2022.
14. The SLP refers to the Infrastructure Development Plan (IDP) (CD_3.142_Infrastructure-Delivery-Plan-October-2021) and in response to a question relating to the medical hub from the LP Inspector (Hearing Statement Ref Matter 7, Issue 15), TWBC replied that the NHS/CCG recognises “A strategic assessment linked to the overall growth in the Local Plan will need to be undertaken by the CCG with local practices to inform requirements”. In the following paragraph 83 TWBC go on to say: “It is, however, important to emphasise that a more detailed discussion and assessment is required in this area to define any future requirements; **specifically noting that the majority of housing growth proposed in Horsmondon is expected in the latter part of the plan period**”. This expectation of timing has now changed as highlighted in 13. above, and there is a serious misalignment between the SLP and the IDP not only regarding inadequate medical services to cater for the allocations for Horsmondon, but also all other infrastructure which will be impacted by this timing change, including education, water supply, sewer and sewerage capacity, power supply, and highways issues.

Appendix 1

| Breakdown of Allocation for AL/HO3 - Land to the East of Horsmonden | | | | Orange | Non-housing | | | | |
|--|--|-----------------------|------------------------|--------------------------------------|------------------------------|-------------------------------|-----------------|-------------------|-----|
| (Refer SLP AL/HO3 Site Layout Maps 26/62) | | | | Residential & Surgery Use | Roads, SUDs | | | | |
| Description | Reference | Site Area (ha) | Gross Area (ha) | Buffers. Surgery Allowance | Housing Net Area (ha) | Housing Density (h/ha) | Houses # | Notes | |
| | | per Ref. | a) | b) | | c) | | | |
| 1. School Expansion Land to NW | SHELAA 324 | 1.82 | n/a | n/a | n/a | n/a | | | |
| 2. Old Station Garage & Hop Pickers Line | SHELAA 108 | 1.85 | 0.45 | 25% | 0.34 | 30 | 10 | | |
| 3. Bassetts Farm Brownfield Devt. (granted) | 19/03657/REM | 0.93 | 0.93 | 30% | 0.65 | 30 | 20 | | |
| 4. Land to S & SW of HO3 | SHELAA 82 | 1.01 | 0.39 | 100% | 0.00 | | | | |
| 5. Land to East of PROW WT340A | SHELAA 297 | } | 2.05 | 25% | 1.53 | 25 | 38 | d) | |
| 6. Land to West of PROW WT340A | SHELAA 297 | | 13.79 | 25% | 2.39 | 30 | 72 | | |
| 7. Land for Doctor's Surgery | SHELAA 297 | | 0.22 | 100% | 0.00 | | | | |
| AL/HO3 Overall | | 19.4 | 7.23 | | 4.91 | Allocation | 140 | e) | |
| Notes: | | | | | | | | | |
| a) | By measurement (orange areas Map 26) | | | | Summary of Land Use: | | | | |
| b) | Calculated | | | | Residential Use | 4.91 | | | |
| c) | As per SHELAA methodology Main Report 3.38. (SLP range is +/- 5 h/ha on density) | | | | Doctors' Surgery & School | 2.04 | | | |
| d) | Lower density per AL/HO3 (5.609). Subject to LVIA | | | | Roads, Buffers, SUDs etc | 1.71 | | } Non-Residential | |
| e) | Mid range as per methodology | | | | Open Space (incl SW SUDs) | 10.74 | | } Use | 55% |
| | | | | | | 19.40 | 12.45 | 64% | |