



# Withyham Parish Council

Chairman: Mrs Diana L Kelly

Clerk: Mrs Deborah Siddle  
Ass. Clerk: Mrs Natalie Brett

## **Withyham Parish Council (WPC) Response to the Consultation on Tunbridge Wells Local Plan**

Withyham Parish Council has approximately 3,000 residents and sits against the Kent border at the River Grom. Many of our residents use the amenities and facilities within Kent, including those of Tunbridge Wells Borough Council and equally many of our services and amenities are used by residents in Kent, including those covered by Tunbridge Wells Borough Council. Withyham Parish Council welcomes the opportunity to respond to this consultation.

### General Observation

It would appear that the whole plan is driven by the housing requirement set out in the working paper Housing requirement. This has simply applied the Government's standard prediction model resulting in a step change from the current Core strategy requirement of 300 dpa to 678 dpa. In our view this is not sustainable and cannot be achieved. The Draft TWBC Local Plan also states the prediction is based on 2014 data which is out of date and that HMG plans to review the model in 18 months time in any event. We suggest the whole plan should be delayed by 18 months or TWBC prepares its prediction based on the model used for the adopted Core Strategy.

### More Specifically:

1. Tunbridge Wells is on the Kent/East Sussex border. There is no evidence in the Local Plan of any impact assessment of the proposed expansion of Tunbridge Wells (to include 780 new dwellings and 80,000 sq M of business space) on towns and villages just the other side of the border. This is a significant omission because we believe TWBC has a legal duty to assess and take into account such impacts.
2. WPC considers that the impact on adjoining settlements is potentially very significant because:

**Traffic** – the A26, which passes close to the WPC Parish Boundary and feeds the village of Groombridge and the B2110 that passes through Withyham Parish (leading from the A272), are both significant feeder roads into Tunbridge Wells, yet they are already sub-standard and congested.



# Withyham Parish Council

Chairman: Mrs Diana L Kelly

Clerk: Mrs Deborah Siddle  
Ass. Clerk: Mrs Natalie Brett

The A26 is also significant because it is the primary route between Tunbridge Wells the Port of Newhaven and the Brighton conurbation resulting in a lot of heavy traffic in both directions.

The A272 (and the B2110) is significant because it provides routes to and from Gatwick Airport and Crawley New Town

Extra pressure on these roads will exacerbate the already unacceptable tendency of traffic to use minor roads as 'rat runs' causing increased danger and disturbance to local residents and businesses.

**Recreation** – The proposed residential expansion of Tunbridge Wells will inevitably lead to recreational pressures on the surrounding countryside and particularly in the countryside in the East Sussex side of the border. WPC is concerned that not only will existing facilities become overused and will therefore have to be more tightly controlled but it will also lead to additional recreational development pressure in this area of the AONB. It is noted that this pressure would arise directly from a population that has no direct stake in, or responsibility for, this area.

### 3. Other Observations:

**House Prices** – WPC is concerned that the proposed expansion of Tunbridge Wells will place an upward pressure on house prices in the surrounding villages where supply is essentially finite. WPC is extremely concerned that first time buyers and many key-workers are already priced out of the local market. This has social implications for the vitality and sustainability of local villages.

**Spratsbrook Farm:** WPC objects to the proposed allocation at Spratsbrook Farm, Frant Road (Policy AL/RTW18) on the grounds that it has an illogical southern boundary defined only by the Borough boundary. Its development will also impact on the Ashdown Forest Special Protection Area.

**Schools:** WPC considers that Spratsbrook is a poor location for a new secondary school as the majority of the new housing will be to the east of Tunbridge Wells. WPC is also concerned that the extra pressure on secondary schools in Tunbridge Wells will put a squeeze on the number of pupils that can be accommodated from outlying towns and villages.



# Withyham Parish Council

Chairman: Mrs Diana L Kelly

Clerk: Mrs Deborah Siddle  
Ass. Clerk: Mrs Natalie Brett

**Consistency with the Wealden Draft Local Plan** – The Wealden Draft Local Plan as currently proposed places the development emphasis firmly in the South of the District around Hailsham primarily to protect the Ashdown Forest from traffic and recreational pressures from the further expansion of areas in and around Crowborough and Uckfield. The proposed development of Tunbridge Wells being promoted in the TWBC Local Plan appears to fly in the face of Wealden's rational and interpretation of the Habitat Regulations. Both Councils cannot be right on this point.

**The Metropolitan Green Belt** - It is noted that the TWBC Draft Plan proposes a loss of 5.35% of the MGB to achieve the predicted housing requirement. It is further noted that Sevenoaks District Council's Draft Local Plan claims the Green Belt is sacrosanct which will result in a shortfall of 1,900 dwellings. Again, both positions cannot be a sound interpretation of Green Belt policies.

**Gatwick Airport** - We note the TWBC Draft Local Plan is silent on Gatwick Airport. While WPC accepts that TWBC has no direct control over Gatwick Airport (albeit that Gatwick is seeking to influence neighbouring land use policies) there is without doubt considerable environmental concern locally over noise and air pollution from overflying aircraft, especially in relation to sensitive parts of the AONB and Green Belt. It is noted that pollution levels, especially over the Ashdown Forest Special Protection Area (which is extensively over-flown by Gatwick) are forecast to continue rising significantly. WPC proposes there should be a positive policy in the Local Plan committing TWBC to engaging with other Local Planning Authorities similarly effected, the various Air Traffic Bodies, Pressure Groups, and Government with a view to making sure the voice of Tunbridge Wells is heard when changes are being proposed to flight paths and the frequency/timing/height etc at which they are flown. WPC has made a similar representation on the WDC Local Plan.