

From the Rt Hon Greg Clark MP



HOUSE OF COMMONS

LONDON SW1A 0AA

4 June 2021

Local Plan
Tunbridge Wells Borough Council
Town Hall
Civic Way
Tunbridge Wells
Kent TN1 1RS

Dear Sir/Madam

Please accept this as a response to the Tunbridge Wells Borough Council Regulation 19 consultation, which is currently in progress.

I support the intention to adopt a local plan, since this is the most secure way to ensure that important decisions – such as where new development takes place, the conditions development must meet, protection of our beautiful and precious natural environment, safeguarding against flooding and the provision of public infrastructure – are made locally. A failure to adopt a local plan that passes examination in public would mean that all parts of the Borough – towns and villages – would be subject to uncontrolled, unplanned speculative development with the national Planning Inspectorate deciding on individual applications, rather than our own elected councillors with their deep knowledge of our local area.

I note that the draft plan has been developed by a cross-party working group and that it was supported by all of the political parties represented in the Tunbridge Wells Borough Council. For such a detailed and long-lasting plan this seems to me to be the right approach to take to its development.

Clearly the most appropriate forum for detailed proposed changes is the Examination in Public that follows submission of a proposed plan. At that Examination in Public members of the public and their representatives will be able to make detailed proposals for change to particular sites directly to the Inspector who will have the power to order modifications to the submitted plan.

I intend to request to appear in person at the Examination in Public to represent the views of my constituents in every part of my constituency.

While this stage is not for the detailed changes that the Examination in Public will consider, it is important that the draft plan is clear about strategic objectives. I set out here a number that I would be grateful to have taken into account prior to submission. They comprise seven principles for a sustainable local plan that I would like to see the plan reflect.

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These are:

1. Protecting our precious natural environment

It is of prime importance that any new development, anywhere in the Borough, must be environmentally sustainable. We are fortunate to live in one of the most beautiful parts of Britain, with both Green Belt and Areas of Outstanding Natural Beauty, as well as environmentally important and beautiful land that does not carry such a formal designation.

In areas of proposed significant development - including but not limited to those close to Capel, Paddock Wood, Ramslye, Hawkhurst and the Weald villages – it is important at the Examination in Public that the impact on the natural environment – including the volume, design, density and sustainability of the proposals – is assessed in detail, including by independent bodies such as The Woodland Trust and Kent High Weald Partnership, and that alternatives to the initially proposed sites are rigorously considered.

For example, too many recent developments have involved the loss of mature trees which I believe must be avoided in a sound plan. It will also be necessary to consider the differences in the character of settlements – including in Capel, for example, the centuries-old tradition of smaller, hamlet-like settlements.

2. “I before E”: Infrastructure before Expansion

Too often new development takes place before - and in many cases, without - the necessary infrastructure being provided. This includes not just road capacity, but provision for GP surgeries, schools, public transport (buses and trains), drainage and sewerage capacity and other aspects of supporting investment.

I strongly urge the Council to emphasise in the proposed plan and through the Examination in Public a clear principle that I term “I before E”: no expansion should take place by way of development being started unless and until the supporting infrastructure is agreed, funded, contracted and construction started or work commenced.

3. Brownfield first

Once built on, it is difficult to return land to nature in the future. So we must be sparing in our use of green fields, even outside the formally-designated Green Belt and Areas of Outstanding Natural Beauty. The plan should adopt the principle of ‘Brownfield first’ – making use of land that has been previously developed and is no longer needed for its current use. Sometimes this will involve the Council or developers investing to remediate land that has been contaminated by previous uses. The plan should be clear that gardens should not be considered to be previously developed ie brownfield land.

4. Establish walking, cycling and equestrian connections between every settlement in the Borough

The opportunity of a 10-year local plan is that it should establish connections between places that would not be possible through piecemeal, unplanned development. There is a major opportunity to do this with walking and cycling routes connecting our settlements.



Many local people have, during lockdown, discovered the delights of the area around us. They have made use of public footpaths and bridleways that have been established in the past. This plan should be an opportunity to provide more connections for this and future generations. Too often, especially in the countryside, the ability to enjoy the glories of our natural environment and to live in rural areas are impeded by the lack of safe pedestrian or cycle or equestrian routes between settlements and sometimes even within them.

I believe that the plan should set out a clear ambition to ensure that all settlements within the Borough are connected to each other by safe routes for non-motorised traffic. Sometimes they will be provided alongside motor vehicle routes – such as the cycleway which follows the A21 between Tonbridge and Pembury, for which I successfully campaigned. At other times, the opportunity should be made to establish walking and cycling routes away from roads, such as using existing public rights of way and establishing new ones.

5. Road traffic should be provided for, not wished away

The plan should embody a significant upgrade in our road capacity. In the past, it was thought that if road capacity was restricted, making travel by car more unpleasant and unpredictable, it would cause car use to fall away. That was a fallacy. Locally, the dualling of the A21 shows the right approach. When it was restricted to a single carriageway between Tonbridge and Pembury, traffic did not reduce but instead pollution, environmental degradation and accidents (several of them fatal) increased. The dualled A21 is a better, safer, cleaner and more environmentally positive road than the one it replaced.

By 2030, no car with a petrol or diesel engine will be sold in the UK. This means that during the lifetime of the proposed plan, the assumption that cars are sources of pollution – damaging air quality and contributing to climate change – will have to change. Soon, all cars will be powered by clean electricity or hydrogen and contribute no damaging emissions.

There is much that needs to be upgraded in our road network. In particular, the plan should emphasise the importance of dualling the A21 south of Kippings Cross. It should also provide for an alleviation of the dangerous and congested A228 crossing Colts Hill – which, as the principal route between Tunbridge Wells, Maidstone and the Medway towns, should be regarded as a prime strategic route. The congestion within our towns should be addressed – including the Pembury Road into Tunbridge Wells and the notorious crossroads at Hawkhurst. The proposed plan would be an important place to emphasise a vision for reduced speeding between villages. It goes without saying that the plan should not reduce road capacity. In that respect, the bizarre appearance of an option of closing to traffic (other than buses) the railway bridge at Paddock Wood should be dropped immediately. It is so obviously inappropriate that residents should not have to worry about it.

6. Any new development must positively reduce, and not add to, the flood risk for existing residents

Several parts of the Borough are in low lying areas and/or in areas with a history of flooding. All the indications are that we should prepare for more frequent incidences of weather events that give rise to flooding than was typical in the past.

I share the concerns of my constituents that existing levels of protection have often not been adequate to the demands of current meteorological conditions. Through a debate in the House of Commons, and subsequent pressure on Southern Water, I have obtained action to install a new "round-the-town" drainage system in Paddock Wood, as well an investment in infrastructure such as in Nevill Street, Tunbridge Wells. The local plan should make two inviolable requirements of any new development:

- (i) That it will not add to the overall flood risk of the area in which it is proposed;
and
- (ii) That it will take the opportunity to *reduce* the current flood risk faced by existing residents. This can be achieved by requiring, for example, investment in new drainage infrastructure or upgraded pumping stations to serve existing populations, or to create flood defences such as flood containment areas.

Consistent with principle 2, these commitments should be required to be enacted *before* development can take place.

7. Better provision should be made for playing fields, sport and leisure facilities

An advantage of development that is planned rather than speculative and piecemeal is that it can provide for collective facilities that will be needed now and in the longer term.

Sports and leisure facilities are prime among these. The erosion of playing fields must be ended and the local plan should establish the principle that no playing field should be lost – in whole or part – without an equal or better new facility being provided in its place. In this respect, better should refer to both area and quality.

New sports and leisure facilities should be established in return for new development. This will involve providing for upgraded facilities – for example all-weather pitches are increasingly demanded to allow year-round sporting events to take place. Care should be taken that the provision of new sports facilities is undertaken sensitively and not at the expense of other valued uses.

I would be grateful if the Council would consider these recommendations as it revises the plan for Examination in Public, at which point I will contribute further specific requests and representations on individual sites directly at the Examination in Public.

Yours faithfully

