

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 4: The Strategy for Paddock
Wood**

**Issue 7: Policy Requirements /
Masterplanning**

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Matter 4 – The Strategy for Paddock Wood

Issue 7 – Policy Requirements / Masterplanning

Inspector's Question 1: [re. Suggested Masterplanning changes]

Do the suggested changes adequately address the issues identified in the Inspector's Initial Findings? If not, what changes are necessary to make the Plan sound?

TWBC response to Question 1

Introduction

1. The significant expansion of Paddock Wood and East Capel remains a logical option for the development strategy of the Local Plan which is confirmed by the Inspector in his initial findings. However, in order to address the matters raised regarding strategic growth at Paddock Wood and Tudeley Village, significant alterations to the Council's strategic strategy are necessary.
2. The Development Strategy Topic Paper Addendum [[PS_054](#)], at section 4.0, outlines the areas of work the Council has evaluated following the Inspector's initial findings and the consequential changes to the Strategic Sites strategy which have been made.

Consideration

3. The council has reviewed the matters of concern raised by the inspector. The Inspector has raised concerns regarding the level of development proposed within areas of higher Flood Risk (flood zone 2/3 land) within the Submission Local Plan. In response, the Council has commissioned updated flood modelling taking account of the latest data and revised the quantum of growth for PWeC within Flood Zone 1 only (approximately 1,000 homes at PWeC, which directly responds to the Inspector's concern.

4. For education, the Council has set out within the hearing statement for Matter 3, Issue 3 (Wider Infrastructure Provision) [[TWLP/125](#)], that a different solution is necessary in order to meet the educational needs from the strategic growth (largely as a consequence of the removal of the Tudeley Village allocation). As such, the Council has evaluated the options available and presented a robust position comprising safeguarded land whereby one of two available options can come forward (at a suitable time to mitigate the impacts from development) to meet the education demand as necessary. The Council's hearings statement in response to Matter 4, Issue 2 explains this issue in more detail
5. For Sport and Leisure provision, again a revised strategy for delivery of sport and leisure enhancements is needed, largely due to a combination of a significant reduction in the level of growth (approximately 1,000 homes at PWeC (at sites within STR/SS1) and a further 2,400 homes with the removal of Tudeley Village)) and the need to make best use of flood zone 1 land for housing within PWeC. Nevertheless, the Council has sought to maintain a significant level of new Sport and Leisure provision, based on evidence submitted with the local plan which provides tangible enhancements for the settlement and to support the development at Paddock Wood and east Capel.
6. With regard to employment, the extent of new employment land proposed to be allocated has been revised due to the extent of Flood Zones 2/3 when taking account of the updated flood modelling and once the sequential test is applied. The Council's considerations in this regard are set out within the Employment land provision at Paddock Wood' [[PS 045](#)].
7. The above matters have all informed the further Masterplanning work which has been undertaken which is detailed within the Masterplanning Addendum document [[PS 046](#)]. This document builds upon the methodology utilised within the initial DLA Masterplanning and Infrastructure Study [[CD 3.66](#)] which formed part of the evidence base for the Submission Local Plan.
8. The Masterplanning Addendum comprises a thorough assessment of the revised growth scenario and illustrates how the key areas of infrastructure, outlined above, are addressed within a revised Framework Plan. The revised growth scenario has also been subject to revised viability testing to ensure the levels of necessary infrastructure are deliverable through the revised quantum of strategic development. This matter is outlined

in more detail in the Council’s hearing statement for Matter 4, Issue 5. As such, the revised Masterplanning represents a well-planned, deliverable spatial option for the strategic growth at PWeC which is able to deliver significant enhancements to the settlement.

9. As a result of further consideration on each matter discussed above, together with the need to make the Strategic Policy (STR/SS1) more specific in terms of what facilities/infrastructure will be coming forward and where, a revised version was included under Appendix D of The Development Strategy Topic Paper Addendum [[PS_054](#)]. Further discussion on this is included as part of the Council’s response to question 2.
10. Overall, the Council considers that alterations were necessary to policy STR/SS1 in order to resolve all outstanding matters of soundness that the Inspector raised, or that require to be resolved, and that the suggested changes to the Strategic Sites allocation adequately address the issues identified in the Inspector’s Initial Findings.

Inspector’s Question 2: [re. Is the policy wording justified and effective?]

Is the suggested policy wording justified and effective?

TWBC response to Question 2

Introduction

11. The Development Strategy Topic Paper Addendum [[PS 054](#)], outlines at section 15.0, the alterations made to the Strategic Policy for PWeC in order to address the issues identified in the Inspector’s Initial Findings. A revised version of Policy STR/SS1 was included under Appendix D of The Development Strategy Topic Paper Addendum [[PS 054](#)].

Consideration

12. This revision seeks to reorganise much of the policy in a more succinct way to make it more effective. The Council has also sought to reduce the reliance on Supplementary Planning Documents for each of the individual development parcels, by allocating each parcel for development, setting out the scale type and mix of uses to come forward.

13. The alterations seek to make a distinction between the development principles affecting the entirety of the allocation, the Masterplanning approach expected, and what shared strategic infrastructure will require contributions from the strategic development.

14. Individual areas of the development are specifically identified and allocated based on developer controlling ownerships. These allocations will identify the scale of development and what infrastructure will need to be delivered in each development parcel. Furthermore, the expectations that development will come forward in accordance with the strategic aims of the policy will be included.

15. Each development parcel allocation will include the requirement for a masterplan and the overarching Masterplanning principles, require this to be conducted in a collaboratively way with the neighbouring developer on each side of the settlement. The Council considers this is important to ensure consistency in approach to key matters including connectivity, development parcel structure and design responses to particular landscape characteristics.

16. The Council also considers it would be appropriate to retain the inclusion of a Framework Masterplan Supplementary Planning Document (SPD) which will provide overarching principles relevant to the Strategic Sites and allow an extra layer of detail to be incorporated within a policy document which carries weight in consideration. This will be brought forward with the adoption of the local plan and would not compromise the timescales envisaged for the Masterplanning process of the remaining development parcels.
17. As a result of further consideration of the strategic policy, the Council has undertaken a further review of the policy informed by liaison with the developers for the Strategic Sites and the points made within the representations received. This has resulted in a further revision to the SS1 policy wording in order to make this policy clearer and more effective. This is added under Appendix 2 to the hearing statement for matter 4, Issue 3.
18. Overall, it is considered that these proposed changes to the policy will enable it to be effective in the determination of planning applications, by ensuring that strategic delivery of infrastructure will come forward at the right time ensuring that developments conform with the strategic aims and objectives of the plan.

Inspector’s Question 3: [re. How does the revised masterplan address impacts on the Green Belt between Paddock Wood and Five Oak Green?]

The Green Belt Assessment Stage 3 Study¹ identified potential mitigation measures to reduce impacts on the perceived separation between Paddock Wood and Five Oak Green. How does the revised masterplan relate to the evidence and need to ensure separation between the two settlements?

TWBC response to Question 3

Introduction

19. The Green Belt assessment for STR/SS1 is covered in the Green Belt Study Stage 3 [CD 3.141] under the former reference AL/CA3 and AL/PW1 starting on page 74 and sets out potential mitigation measures on page 80 paragraphs 4.145 to 4.147. The methodology for the Stage 3 Study explains that potential mitigation measures are “high level guidance” and makes reference to any mitigation measures in the draft policy and guidance within landscape character and sensitivity assessments (paragraph 3.56).

20. For the release of land at Paddock Wood the potential mitigation measures include reference to measures in the then draft policy regarding the landscape treatment to the A228 and internal landscaping and then make four further recommendations:

- “Reduce the urbanising effect of development when travelling along Badsell Road through use of set-back and appropriately designed road infrastructure to maintain the rural character of the road; and gradation in scale of built form, with lower density development to the periphery and in vicinity of railway and Badsell Road.
- Open space and planting to the west and south of the allocation to reduce impact on perceived separation between Paddock Wood and Five Oak Green/Tudeley Village.
- Reduce the potential impact on the sense of separation from the washed-over settlement of Whetsted through use of set-back from the A228 and by enhancing hedgerow planting and introduction of characteristic small woodland copses and tree belts along the A228.

¹ Core Document 3.141

- Use of sustainable drainage features to define/enhance separation between settlement and countryside, integrating with existing pattern of dykes and streams”.

21. For the strategic allocations at Paddock Wood and Tudeley Village the Green Belt Stage 3 Study had the benefit of masterplans which were reviewed and noted at paragraph 4.150 within those “*measures, which, if implemented in the way indicated, would help to minimise harm*” as:

- “A proposed ‘Sports Hub Area’ and adjacent Green Strategic Landscape Corridor to the south-west of the allocation site, which would help reduce impact on perceived separation between Paddock Wood and Five Oak Green/Tudeley Village.
- The retention and mature vegetation surrounding Badsell Manor to the south-west of the allocation site, which would help to reduce the urbanising effect of development and the impact on the perceived gap between Paddock Wood and Tudeley Village.
- The strengthening of hedgerows and vegetation along the A228, which will strengthen its role as a Green Belt boundary and help reduce impact on adjacent Green Belt land to the west and north-west.
- The retention of vegetation (hedgerows and woodlands) within the allocation site, which would help to further reduce the potential visual influence of development on adjacent Green Belt land.
- The set back of development and strengthening of vegetation along Badsell Road, which would help to reduce the urbanising effect of development when travelling between Paddock Wood and Tudeley Village”.

22. At paragraph 4.151 the Study reemphasised the importance of the use “of set-back from the A228 boundary and by enhancing hedgerow planting and introduction of characteristic small woodland copses and tree belts along the A228” to reduce the effect on the Green Belt in relation to the washed over settlement at Whetsted.

Consideration

23. This Inspectors question arises primarily because the masterplan for STR/SS1 (as set out in Appendix 2 to the hearing statement for matter 4, Issue 3) Development Strategy Topic

paper Addendum [[PS_054](#)] has a changed in relation to development proposed to the west of Paddock Wood and in particular the extent and distribution of development in relation to the proposed boundary with the Green Belt along the A228 Whetsted Road has also changed.

24. North of the railway line the main difference is a reduction in built development particularly to the very north. South of the railway line there is some reduction in development but some built development is now placed alongside the A228 Whetsted Road where the sports hub was going to be, and the landscape buffer to Badsell Manor has been increased. Overall areas of greenspace/flood mitigation have increased.
25. Previously the issue of Green Belt Harm and mitigation in relation to the release of land west of Paddock Wood was covered in Hearing Statement [TWLP/024](#) Matter 6: Strategic Sites Issue 3: Paddock Wood and East Capel under Inspectors Question 5.
26. As noted in the Green Belt Stage 3 study the Hearing Statement (paragraph 25) referred to draft policy wording which included a requirement for the *“retention and enhancement of hedging and trees along the A228; the need for development to be set back from A228 to reduce visual impact of development on countryside; and use of internal hedging and tree belts along field boundaries to influence development layout”*.
27. Hearing Statement TWLP/024 went on to identify the mitigation measures within the Green Belt Stage 3 Study highlighted above in the introduction and explain how they had been taken into account with the masterplan (paragraph 27). The Hearing Statement also suggested that the Structure Plan “can be strengthened through the further iterations of the Framework Masterplan that is required by Policy STR/SS 1.
28. The policy for STR/SS1 has been revised (attached under Appendix 2 to the hearing statement for matter 4, Issue 3). 1 - Policy STR/SS 1 - The Strategy for Paddock Wood, including land at east Capel)) to ensure that it specifically includes a requirement for the *“retention and enhancement of hedging and trees along the A228; the need for development to be set back from A228 to reduce visual impact of development on countryside; and use of internal hedging and tree belts along field boundaries to influence development layout”* as well as the other mitigation measures recommended by the Green Belt Stage 3 Study.

29. The specific requirements for the boundary treatment to the A228 are supported by other measures within the policy that will reduce Green Belt harm including the requirement for masterplanning, using a landscape led approach and requirement that “*development proposals for the whole of the allocated area shall embed garden settlement principles*”.

Conclusion

30. Whilst the masterplan for STR/SS1 which includes the land proposed to be released from the Green Belt west of Paddock Wood has changed overall there is a reduction in built development and an increase in green space which is likely to lessen the overall harm to the Green Belt.

31. Whilst there are some localised changes that might reduce the effectiveness of mitigation (e.g. development closer to Badsell Road) there are other changes that would increase effectiveness (e.g. more planting around Badsell Manor).

32. Mitigation measures are included within the policy to ensure that they are included within any detailed application. Subject to appropriate mitigation measures there is no reason to think that the harm to the Green Belt will be any greater as a result of the proposed changes and indeed there a good possibility that harm will be reduced by virtue of the reduced area now proposed for built development.