

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council**  
**Hearing Statement**

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

**Issue 8: Exceptional Circumstances**

**Document Reference: TWLP/141**



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# Matter 4 – The Strategy for Paddock Wood

## Issue 8 – Exceptional Circumstances

### Inspector’s Question 1: [re. Exceptional Circumstances for the release of Green Belt around Paddock Wood]

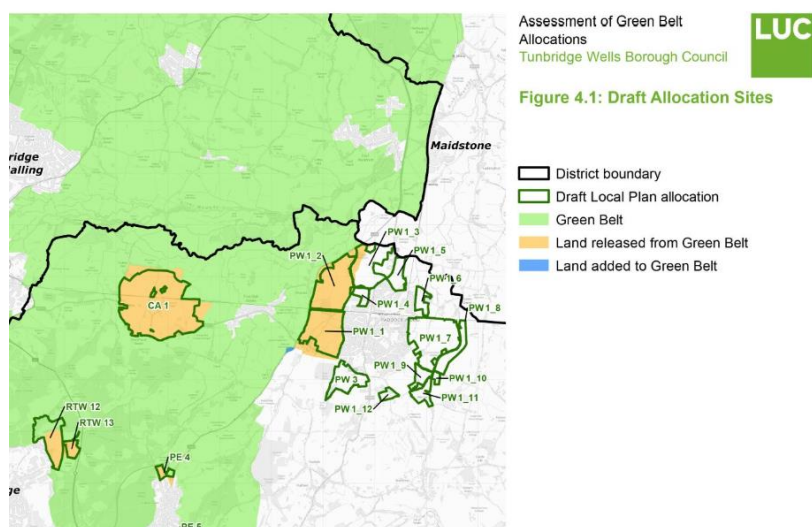
Following the Council’s suggested changes to the Plan, do the exceptional circumstances exist to alter the Green Belt boundary in this location, having regard to paragraphs 140 – 143 of the Framework?

### **TWBC response to Question 1**

#### Introduction

1. The question relates to the proposed Green Belt release for land west of Paddock Wood – land at East Cape within Capel Parish, under Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel.
2. The current extent of the Green Belt Boundary around Paddock Wood and in relation to the adjacent Boroughs to Paddock Wood is illustrated in Figure 4.1 page 34 of the Stage 3 Green Belt Study [[CD 3.93c](#)] an extract of which is provided below.
3. The land to be released from the Green Belt extends from the northern tip where it meets the borough boundary with Maidstone Borough and to the south where it meets the B2017 Badsell Road and to the west where the A228 Whetsted Road will form the proposed new Green Belt Boundary. To the north there is no Green Belt within Maidstone Borough and to the south immediately beyond Badsell Road there is no Green Belt east of the A228.
4. The Council set out the justification for the Green Belt release in the Development Strategy Topic Paper for the Pre Submission Local Plan [[CD 3.126](#)] and previous hearing statements.

5. The question arises as to whether the release of Green Belt Land as proposed remains justified as within the submitted revised strategy the extent and quantum of development proposed with STR/SS1 and particularly on the land west of Paddock Wood in Capel parish is reduced.



Extract Figure 4.1 page 34 of the Stage 3 Green Belt Study

## Consideration

6. The Council set out its approach to Green Belt release and the exceptional circumstances in the Development Strategy Topic Paper for the Pre-Submission Local Plan [\[CD 3.126\]](#) section I page 56 and in a number of hearings statements most notably Matter 4 Principle of Green Belt Release, Issue 1: Principle of Green Belt Release [\[TWLP/018\]](#) and Issue 3: Exceptional Circumstances [\[TWLP/020\]](#).
7. Matter 6: Strategic Sites, Issue 3: Paddock Wood and East Capel [\[TWLP/024\]](#), Q7 specifically sets out the exceptional circumstances for the Green Belt release in this location. The matters set out under paragraph 39 a. to c. of that Hearing Statement relating to location and sustainable development and betterment in terms of flooding still apply to the revised proposal for STR/SS1.
8. The Councils approach with regards paragraph 141 of the NPPF and the need to examine “fully all other reasonable options” is specifically addressed in response to Matter 4, Issue 1 [\[TWLP/018\]](#), Question 3 and the Council’s position in relation to that question remains unchanged.

9. With regards Paragraph 142 and the need to promote sustainable pattern of development the Inspector agrees with the Council at paragraph 52 of his initial findings letter that Paddock Wood is a “*logical choice for growth*” based on its inherent sustainability credentials with some surrounding land outside the Green Belt.
10. A requirement when adjusting Green Belt boundaries is that they “*can endure in the long term*” (paragraph 140 of the NPPF) and that plan should “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” (NPPF paragraph 142 f).
11. Table 5 at page 70 of the of the Development Strategy Topic Paper for the Pre-Submission Local Plan [[CD 3.126](#)] sets out the Green Belt outcomes for STR/SS1 and notes that:

*“The Green Belt in this area follows the western extent of existing development at Paddock Wood. The allocation provides for an expansion of Paddock Wood to the west and north up to the A228. To accommodate these allocations, it is proposed that the Green Belt is rolled back to the A228 as a permanent and recognisable feature which will include some non-allocated sites along the roadside”.*
12. The approach of using the existing A228 as a “*readily recognisable and likely to be permanent*” new boundary, is a logical one and noting the particular relationship with areas of Green Belt outside the borough boundary as illustrated in the figure above after paragraph 5, it is also logical that the A228 should serve as the new Green Belt boundary from south of Badsell Road all the way north to the Borough Boundary.
13. The suggested changes to the plan, and the extent and nature of proposed development within the land to be released from the Green Belt under STR/SS 1 can be seen on Revised Map 28 Paddock Wood and East Capel Structure Plan (Appendix 1 Plan taken from Local Plan Development Strategy Topic Paper – Addendum January 2024 [[PS 054](#)]). When compared with the previous proposal as illustrated on corresponding Map 28 in the Submission Local Plan [[CD 3.128](#)] it can be seen that the amount of development is reduced and various elements of proposed development are rearranged and that overall there is a larger extent of open land to the north of proposed built development.

14. In considering the revised Map 28 and noting the existing alignment of the Green Belt in this area and, in particular the absence of Green Belt in Maidstone Borough, the A228 remains the most logical boundary for the Green Belt in this location there being no other comparable feature that might provide that “*readily recognisable and likely to be permanent*” new boundary.
15. In addition, the land between areas of proposed development and the A228 might usefully accommodate works associated with betterment in terms of flooding, and associated infrastructure such as access arrangements and amenity uses which, in some cases, might be deemed inappropriate in Green Belt terms. Further alignment allows for flexibility in layout and disposition of built development to be secured through a detailed submission and removes any uncertainty as to whether the development can be accommodated within the released land.

## Conclusion

16. The exceptional circumstances and justification for the Green Belt release in relation to STR/SS 1 set out in previous hearing statements remain valid for the revised proposals now under consideration.
17. Taking into account the existing Green Belt boundary, the relationship of the Green Belt boundary with Maidstone Borough and the revised masterplan for STR/SS 1 the A228 remains the most logical and appropriate new Green Belt boundary west of Paddock Wood extending from the northern borough Boundary to south of Badsell Road.