

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council  
Hearing Statement**

**Matter 3: Spatial Strategy and  
Distribution of Development  
(Policies STR1, STR3, STR9  
and STR10)**

**Issue 4: Management of  
Development in the Green Belt**

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# Matter 3 – Spatial Strategy and Distribution of Development (Policies STR1, STR3, STR9 and STR10)

## Issue 4 – Management of Development in the Green Belt

### Inspector’s Question 1: [re. settlements ‘washed-over’ by Green Belt]

*It is sufficiently clear to decision-makers, developers and local communities which settlements are ‘washed-over’ by Green Belt?*

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

#### **Introduction**

1. The extent of the Green Belt is clearly defined on the Policies Map and on plans within the Submission Local Plan (SLP) [[CD 3.128](#)]. The extent is clearly described at the beginning of the Green Belt Policy at paragraph 4.124 with further information provided within the supporting text for each parish.
2. No defined ‘settlements’ are washed over by Green Belt.

#### **Consideration**

3. The extent of the Green Belt is shown on three plans in the early part of the SLP. In Section 2 - Setting the Scene, Figure 2, Borough Location (on page 20) shows the extent of the Green Belt for the borough and the adjoining districts. In the same section, Figure 3, Borough Overview (on page 22) shows more closely the extent of Green Belt in the borough, and it is also shown in section 4, Figure 5 Key Diagram (page 34). This is also shown on the Interactive Map [[CD 3.129t](#)].

4. In the SLP at the beginning of the Green Belt Policy STR9 (paragraph 4.124) there is a description of the extent of the Green Belt and the settlements affected. In Section 5 - Place Shaping Policies of the SLP, the supporting text for each parish describes the extent of the Green Belt; for example, Policy PSTR/PE1, paragraph 5.642. The Policies Maps which support the SLP, and the Interactive Map [PS\\_010](#), also clearly show the extent of Green Belt.
5. No 'settlements', as defined by the Settlement Role and Function Study Update [[CD 3.133](#) paragraph 1.7], are washed over by the Green Belt and this is clearly shown in the Inset Maps for the Policies Map. However, there are scattered dwellings and hamlets washed over by Green Belt and four very small villages with no Limits to Built Development which are also washed over by Green Belt. These villages are Tudeley and Capel to the north of Royal Tunbridge Wells (RTW) and Groombridge, (which is a small part of a much larger settlement mainly in Sussex), and Ashurst (which is a very small village on the western extremity of the borough) which are to the west of RTW. In all of these cases the open character of the villages makes an important contribution to the openness of the Green Belt and so, consistent with paragraph 144 of the NPPF, they are included within, and washed over by, the Green Belt.

## Conclusion

6. In summary, there is no change proposed to those settlements which are currently inset or washed over by the Green Belt, other than in relation to the proposed Green Belt releases, and the position in relation to each settlement is clearly described and illustrated in the SLP and shown on the policy mapping.

## Inspector's Question 2: [re. Policy STR 9]

***Where new development is proposed in the Green Belt, is Policy STR9 justified, effective and consistent with national planning policy?***

### TWBC response to Question 2

#### Introduction

7. The inclusion of Policy STR9 is justified primarily on the basis of providing clarity for readers of the SLP [CD 3.128] as to the Council's approach to Green Belt matters, but also in ensuring the continued protection of the remaining Green Belt.
8. The Council considers it to be an effective policy which is consistent with national policy, and it has been widely supported.

#### Consideration

9. The Policy makes it clear that the Council will apply national planning policy in respect of Green Belt applications, and this is further explained in the supporting text (SLP paragraph 4.131) whereby it sets out that the Council will apply the relevant policy in the NPPF or "*the relevant national planning policy at the time the planning application is determined*". This provides clarity to readers of the Plan who may otherwise be unsure as to what the Council's position on Green Belt is. There was only one objection at Regulation 18 that suggested the Policy be deleted as it simply replicated national policy, but after careful consideration the Council thought it more helpful to include a policy than not, as it provided greater clarity by retaining it and as such it is justified.
10. Further text in the Policy alerts readers to the national policy context and the considerations that will apply to planning applications in the Green Belt.
11. As the SLP includes proposals for the removal of land from the Green Belt, it is required by para 142 of the NPPF to "*set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*".
12. Whilst "*compensatory improvements*" for the release of land from the Green Belt are addressed through site-specific policies in the Plan, Policy STR9 also requires that individual applications for inappropriate development that might come forward will need

to demonstrate very special circumstances which will need to outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm. The Policy also sets out the requirement to provide “*improvements to the environmental quality*” of surrounding Green Belt, which is consistent with planning positively for the remaining Green Belt as required by paragraph 145 of the NPPF and the objective of contributing towards sustainable development.

## **Conclusion**

13. In summary, the Policy is an effective and positive Policy that can endure for the life of the Plan; it provides clarity to readers of the Plan and is consistent with national policy, contributing towards sustainable development.
14. The management of development in the Green Belt is provided for through Policy STR9 which provides the necessary clarity to users of the Plan as to the approach to Green Belt within the Plan and to any future planning applications.
15. The Council believes the policy to be effective and justified. The inclusion of a Green Belt policy has been supported through consultations on the Local Plan and is fully consistent with national policy.