

EXAMINATION OF THE TUNBRIDGE WELLS BOROUGH LOCAL PLAN

EXAMINATION STATEMENT ON BEHALF OF RYDON HOMES LIMITED

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

Prepared by:

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1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of Rydon Homes Limited (“Rydon”), to those Questions raised by the Inspector (dated 16 February 2022), relating to Spatial Strategy and Distribution of Development (Policy STR1, STR3, STR9 and STR10) in respect of the Tunbridge Wells Borough Local Plan (“the Plan”) and its supporting evidence base.
- 1.2 This Statement focusses only on Issue 4 and has been prepared by Neame Sutton on behalf of Rydon. This Statement should be read in conjunction with the Statement prepared by Sigma Planning, which covers the remainder of Matter 3. This Statement should also be read in conjunction with Neame Sutton’s Statement in respect of Matter 4 that deals with the Principle of Green Belt Release.

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

Issue 4 – Management of Development in the Green Belt

Q1. Is it sufficiently clear to decision-makers, developers and local communities which settlements are ‘washed-over’ by Green Belt?

- 2.1 In short no.
- 2.2 Whilst the Plan makes reference to the settlements in the Borough¹ there is no clarity on which settlements are inset from the Green Belt and which are ‘washed-over’. Furthermore, Paragraph 4.49 of the supporting text to Policy STR1 on Page 41 states that

¹ Paragraphs 2.3 – 2.7 on Pages 21-22 of Plan – CD3.128

the development strategy retains the use and definition of Limits to Built Development (“LBDs”) around settlements as ‘policy lines’ indicating where development would be acceptable. There is however no clarity on how the LBDs relate to the Green Belt and those settlements within it.

- 2.3 No further clarity is provided in Policy STR9, nor the Development Strategy Topic Paper October 2021 (CD3.126), nor in the Green Belt Study Stage 3 June 2021 (CD3.141).
- 2.4 The Proposals Map is only clear insofar as the settlements with Inset Maps are concerned.
- 2.5 The Plan would benefit from a table summarising the settlements in the Borough and setting out their relative position in the settlement hierarchy alongside their status in relation to Green Belt, ie. Outside Green Belt, within the Green Belt but with a defined LBD and, washed-over by Green Belt.
- 2.6 It is also unclear whether the requirements of Paragraph 144 of the Framework 2021 have been met in terms of those villages that are to remain washed-over by the Green Belt. This needs to be clarified by the Council.

Q2. Where new development is proposed in the Green Belt, is Policy STR9 justified, effective and consistent with national planning policy?

- 2.7 Whilst Policy STR9 references to Paragraph 149 of the Framework in respect of the definition of inappropriate development and the exceptions and the wording of the Policy also broadly reflects that of Paragraph 148 this is not an exact match. In specific Paragraph 148 refers to the need to ensure that substantial weight is given to any harm to the Green Belt. Policy STR9 is silent on the matter of weight.
- 2.8 Furthermore Policy STR9 sets out a need for improvements to the environmental quality and accessibility of the surrounding Green Belt from all relevant development within the Green Belt. The Council defines ‘relevant development’ as comprising major and minor development only i.e. all development.
- 2.9 The Framework 2021 does set out a requirement for Plans 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 (Paragraph 142) and in this respect Policy STR9 is broadly consistent with the national policy.
