

Examination of the Tunbridge Wells  
Borough Local Plan

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

**Matter 4: Principle of Green  
Belt Release**  
**Issue 1: Principle of Green Belt  
Release**

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# Matter 4 – Principle of Green Belt Release

## Issue 1 – Principle of Green Belt Release

**PLEASE NOTE:** the responses to Matter 4 Issues 1 to 3 and any figures that these statements contain are based on the Local Plan as submitted. A subsequent change is proposed to one allocation in the Green Belt under Matter 7- Residential Site Allocations, Issue - 2 Pembury. The proposed change is covered by Questions 23 to 27 in Matter 7, Issue 2 [TWLP/044] which relate to Policy AL/PE4 – Land at Downingbury Farm Maidstone Road, Pembury. This proposed change is not reflected in the responses to questions set out in Matter 4.

### Introduction

1. The boundaries of the Metropolitan Green Belt originally approved under the development plan submissions of the 1950s did not include land within Tunbridge Wells borough. The Green Belt around Tunbridge Wells was an extension to the original Metropolitan Green Belt and was determined through the Kent Structure Plan in 1980. The precise outer boundary of the Green Belt in Kent was defined in the Kent Countryside Local Plan in 1983.
2. It was the responsibility of the local borough/district councils to define the inner boundaries of the Green Belt and to make due allowance for urban growth needs through the identification of Rural Fringe sites, and this was done through the Royal Tunbridge Wells and Southborough Local Plan in 1988 and through the Paddock Wood Local Plan 1984, although in the case of the latter, the inner boundary was the existing outer boundary and no Rural Fringe sites were identified.
3. The Rural Fringe sites identified in 1988 have now all been developed, allocated, or have a use that is supported by the Plan (see table 7 on page 69 of the SLP [[CD 3.128](#)]).
4. There is no Green Belt in East Sussex county/Wealden district and the borough boundary around most of the southern part of Royal Tunbridge Wells is contiguous with

the Limits to Built Development. The existing extent of Green Belt around Tunbridge Wells and in adjoining districts is illustrated in the Tunbridge Wells Green Belt Study (Stage 1) Figure 6.1, page 41[[CD 3.43a](#)].

## Inspector's Question 1: [re. extent of proposed boundary changes]

***Table 6 in the submission version Local Plan lists proposed changes to the Green Belt boundary. Are these all the boundary changes that would result from the adoption of the Plan?***

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

5. Table 6 in the Submission Local Plan (SLP) [[CD 3.128](#)] lists all proposed changes to the Green Belt, including the small addition proposed to the south-west of Paddock Wood on "*Land west of Colts Hill close to Badsell Road*".
6. The figures provided come from the more detailed Table 6 Assessment of Green Belt Sites in Appendix 1 of the Development Strategy Topic Paper [[CD 3.126](#)].
7. It should be noted that the figures given within Table 6 are not necessarily the whole of the site proposed to be allocated, which often includes significant landscape buffers, but sets out only the area proposed to be released from the Green Belt.

## Inspector’s Question 2: [re. proportion of proposed housing on Green Belt land]

*What proportion of new housing proposed in the Plan would be on land currently designated as Green Belt?*

### TWBC response to Question 2

8. While the Council has provided figures for the percentage of Green Belt within the borough to be released through the Submission Local Plan for all uses (i.e. 5.7%, as set out in Table 6: Green Belt Sites of the SLP [[CD 3.128](#)]), it has not previously calculated the proportion of housing proposed that would be on land currently designated as Green Belt. This is set out in Table 1 below.

Table 1 – Sites allocated for housing in Submission Local Plan sites that are within the designated Metropolitan Green Belt, and proposed new dwelling figures

Site Reference	Number of Dwellings
AL/RTW 5	100
AL/RTW 14	25 - 30
AL/RTW 16	120
STR/SS 1*	1,575
STR/SS 3**	2,100
AL/PE 1	50 - 60
AL/PE 2	80
AL/PE 3	80
AL/PE 4	25
AL/PE 5	19*****
AL/PE7***	35
AL/PE8***	38
AL/SP 1	10 - 12
<b>TOTAL</b>	<b>4,257 – 4,274</b>
<b>Mid-point</b>	<b>4,266</b>
<b>Percentage of total allocations in Green Belt****</b>	<b>46.4%</b>
<b>Percentage of total housing supply in Green Belt*****</b>	<b>32.2%</b>

\* Based on development parcels in the Green Belt, as shown on the masterplanning drawing by David Lock Associates “Development within the Green Belt” at Appendix 1, with an indicative development footprint of 45 hectares, calculated at a rate of 35 dwelling per hectare, giving some 1,575 dwellings.

\*\* Number of proposed dwellings (2,100) within Plan period, although it is noted that the Green Belt changes provide for a further 700 dwellings beyond 2038.

\*\*\* Discounted figures for C2 net number of new dwellings on previously developed land, as set out in the SLP supporting text for both allocations.

\*\*\*\* Based on mid-point of total allocations 8,996 – 9,381 (9,189) in SLP, Table 4, page 42)

\*\*\*\*\* Based on mid-point of total housing supply of 13,257 dwellings, as identified in Table 16 on page 58 of the Housing Supply and Trajectory Topic Paper [\[CD 3.74\]](#)

\*\*\*\*\* This is the total number of dwellings on the site (AL/PE 5), although all but a very small part of the developable area is outside of the existing area of Green Belt.

9. As can be seen, this shows that around 32% of all dwellings in the SLP are proposed to be delivered on land currently within the Green Belt, while some 46% of all dwellings on allocated sites are currently within the Green Belt.
10. The Green Belt is being redrawn by the SLP to exclude all the above housing sites, with the exception of Policy AL/PE8 which will remain in the Green Belt (being outside a settlement, having met the ‘special circumstances’ test for a care home via a planning application).
11. The Green Belt boundary changes also provide for longer-term housing (i.e. beyond the Local Plan period) at Tudeley Village, as set out in the response to Question 8 under Matter 3, Issue 2 [TWLP/015].

## **Inspector's Question 3: [re. use of suitable brownfield sites and optimisation of densities]**

***Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, paragraph 141 of the Framework states that strategic policy-making authorities should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for housing. This will be assessed through the examination and will consider whether the strategy:***

- Makes as much use as possible of suitable brownfield sites and underutilised land;***
- Optimises the density of development, and***
- Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need.***

***How has the preparation of the Plan sought to make as much use as possible of suitable brownfield sites and optimise the density of development?***

## **TWBC response to Question 3**

### **Introduction**

12. Throughout the plan-making process, the Council has had regard to paragraph 141 of the NPPF and sought to examine all reasonable options for meeting housing needs in other ways before concluding that exceptional circumstances exist to release Green Belt land.
13. The contributions to overall development capacity from making as much use as possible of suitable brownfield sites and by optimising the density of development are considered primarily through the Development Strategy Topic Paper revised October 2021 [[CD 3.126](#)], the Brownfield and Urban Land Topic Paper [[CD 3.83](#)] and the Strategic Housing and Economic Land Availability Assessment (SHELAA) [[CD 3.77a](#)].
14. It is noted that Question 4 below asks about the contribution to housing supply from previously developed land and buildings. As the extent of housing supply from brownfield land flows from the process followed in the preparation the Local Plan, the response to Question 4 below addresses both aspects in detail, with an overview here.



The issue of housing density is considered here, although it is appreciated that it will overlap with the Council's response to Question 2 under Matter 8, Issue 2 [TWLP/028].

15. For completeness, in relation to part (c) of NPPF paragraph 141, reference is made to the Council's statements in respect of the Duty to Cooperate [TWLP/001], particularly its responses to Questions 1 and 2, relating to housing and employment needs respectively.

## Consideration

### Brownfield sites and underutilised land

16. In terms of whether the Local Plan's strategy makes as much use as possible of suitable brownfield sites and underutilised land, the Council points to:
  - i. The fact that "*the effective use of redundant, disused, or under-utilised brownfield land and buildings in sustainable locations*" is a Strategic Policy (Policy STR 3) of the Local Plan, with clear support in principle, duly elaborated on. This policy provides a strategic framework for directing development, as well as a basis for determining development management applications.
  - ii. The detailed analysis carried out in relation to the potential for promoting brownfield site allocations and for having higher allowances for, essentially brownfield, windfall sites coming forward to supplement identified sites, as set out in the Brownfield and Urban Land Topic Paper [CD 3.83].
17. The Council's response to Matter 4, Issue 1, Question 4 below expands on the analysis and the contribution it has made to meeting housing need in the borough.

### Density of development

18. The NPPF seeks to promote an effective use of land by both meeting the need for homes and other uses, while safeguarding and improving the environment.
19. National policy, under the heading "*Achieving appropriate densities*", is set out at paragraphs 124 and 125 of the NPPF. This supports development that makes efficient use of land and avoids homes being built at low densities so that development makes optimal use of each site.

20. When making efficient use of land, paragraph 124 sets out a number of criteria that should be taken into account, including the identified need for housing and the availability of land, local market conditions and viability, the capacity of infrastructure and services, maintaining an area's prevailing character and the importance of securing well-designed spaces.
21. This all points towards the need to make the most effective use of land, taking into account the context of the local character, without necessarily duplicating it, and also having regard to market potential and the need for designing attractive and healthy places. Low densities should be avoided unless there are overriding environmental considerations such as TPOs, Ancient Woodland, etc.
22. Guidance in paragraph 125c of the NPPF states that applications should be refused where it is considered that they do not make efficient use of land.
23. Taking into account the NPPF, paragraphs 3.37 and 3.38 of the SHELAA [[CD 3.77a](#)] set out work undertaken to establish the developable area of each site and a yield equating to circa 30 units per hectare. It is recognised, however, that some sites are suitable for either a lower or higher density, depending on site context. Throughout the progression of the Plan, densities were checked and refined based on site opportunities and constraints, and information from evidence base documents. Further details of the methodology used to determine the approximate housing yield of sites is included in the Council's response to Matter 5, Issue 1, Question 2 [TWLP/021].
24. Paragraph 125(a) of the NPPF relates to plans optimising the use of land in their areas, including the use of minimum density standards for city and town centres, and other locations well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas.
25. While the principle behind this guidance is supported, minimum density standards have not been set for developments within the Royal Tunbridge Wells Town Centre or the other town centres identified in Local Plan Policy ED 8: Town, Rural Service and Neighbourhood Centres, and Village Settlements Hierarchy. This is because the town centres of Paddock Wood, Cranbrook and Southborough) are notably diverse in terms of their individual characters and patterns of development. There is also a diversity of character within these town centre areas; for example, Royal Tunbridge Wells is

comprised of a number of separate areas with distinctive individual characters, such as The Pantiles, the High Street and the area around Royal Victoria Place.

26. In order to maintain the character of these areas, and the character of the individual town centres throughout the borough, it was not considered that a 'one size fits all approach' would be the best way forward in making an effective use of land that would encourage an uplift of density while preserving the distinct characters of the borough's town centres. Policy H2: Housing Density takes a more flexible approach which sets out that the density of residential development should have regard to the character of the area, including landscape, topography, surrounding built form, and access to infrastructure and services.
27. With regard to sites allocated in the Submission Local Plan, Section 5 of the Brownfield and Urban Land Topic Paper [[CD 3.83](#)] considers the capacities of brownfield residential sites and brownfield mixed use sites where there is an element of residential development. A table including details of the brownfield residential sites and their anticipated densities is set out in Appendix 3 below. This shows that the brownfield site allocations are being developed at densities higher than 30 dwellings per hectare, with the highest densities in Royal Tunbridge Wells, the primary regional town centre of the borough, which is in line with the Development Strategy Topic Paper [[CD 3.126](#)] and national planning policy that seeks to make optimal use of brownfield sites in accessible locations.
28. Where mixed-use schemes contain an element of residential, a figure of dwellings per hectare will not give an accurate representation of whether the optimal use of the site is being achieved and a more holistic approach was taken. It is worth noting that the majority of these mixed-use brownfield sites are within Royal Tunbridge Wells where the strategic policies for this settlement seek to make the best use of centrally located brownfield sites. The scope and detail of this will be expanded on in a Royal Tunbridge Wells Town Centre Plan. Work on this began earlier this year with the formation of a working group of stakeholders to direct a town centre strategy.
29. Masterplanning work for Paddock Wood Town Centre has identified capacity for 30 dwellings as part of the site's redevelopment. Further details are in the Strategic Sites Topic Paper [[CD 3.67](#) pages 16-17].

30. Planning applications for the development of allocated sites, and additional sites that come forward throughout the plan period will be assessed having regard to Policy H2: Housing Density, as set out above.
31. Where it is considered that a proposal would not make efficient use of land and that a higher density would be more appropriate, especially where the site is in a central or otherwise accessible location, it would be expected to be refused.

## **Conclusion**

32. The Council has taken a positive approach to making the best use of brownfield and underutilised land through both the site allocation methodology and in subsequent work in the Brownfield and Urban Land Topic Paper [[CD 3.83](#)] covered fully in the response to Question 4 below.
33. In addition, the Brownfield and Urban Land Topic Paper [[CD 3.83](#)] demonstrates that brownfield sites in accessible urban areas are allocated for higher densities, making optimal use of this land, taking into account the historical and landscape character of the surrounding area. Further work proposed in the form of a Royal Tunbridge Wells Town Centre Plan will ensure that a strategy is developed in line with Policy STR 2: Royal Tunbridge Wells Town Centre which continues to optimise the development of brownfield land in the town for mixed residential and other use schemes.
34. Further elaboration in relation to suitable brownfield land is set out under Question 4 below.

## Inspector's Question 4: [re. housing capacity of brownfield sites]

***Can housing needs be met by optimising the use of previously developed land and buildings without requiring land to be released from the Green Belt?***

### **TWBC response to Question 4**

#### **Introduction**

35. As set out in its response to the previous question, the Council appreciates, and has had full regard to, the potential for meeting housing needs in other ways before concluding that exceptional circumstances exist to release Green Belt land.
36. This response gives further detail in respect of whether as much use as possible is made of suitable brownfield and underutilised land, as set out in the first bullet of NPPF paragraph 141. It goes on to conclude on the extent of the potential contribution of such land to meeting housing needs.
37. In terms of policy context, it is also noted that NPPF paragraph 119 more generally promotes the effective use of land and making as much use as possible of previously developed or 'brownfield' land. This is elaborated upon in paragraph 120, including criterion c) which requires that planning policies and decisions should:
- “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”*
38. Indeed, it is particularly important in a borough that has important heritage, landscape qualities and designations (AONB), as well as Green Belt, that effective and efficient use is made of suitable urban and brownfield land. Hence, as part of the evidence gathering on the new Local Plan, the Council has carried out work to ensure that this is the case. This work has been set out below.
39. As part of the evidence base for the new Local Plan, the Brownfield and Urban Land Topic Paper January 2021 [[CD 3.83](#)] reviewed the approach to the development of brownfield and urban land, both in terms of site allocations and the contribution of windfall sites to supply, with a view to ensuring effective, but still realistic, use of such land.

40. Following the Topic Paper, a new strategic policy was included in the Pre-Submission Local Plan, which is carried forward into the Submission Local Plan as Policy STR 3: Brownfield Land. This is significant in that it provides in principle support for proposals where they provide for the effective use of redundant, disused or underutilised brownfield land and buildings in sustainable locations.

## Consideration

### Brownfield site allocations

41. The Local Plan takes a positive approach to allocating brownfield sites. The methodology is set out in the Strategic Housing and Economic Land Availability Assessment (SHELAA) [\[CD 3.77a\]](#). It is also noted that the Sustainability Appraisal considered existing use of land as part of the Land Use Objective to “*Protect soils and reuse previously developed land and buildings*” (see page 289) [\[PS 013\]](#). Positive scores were applied to policies that proposed development on brownfield land and negative to those on greenfield land (with consideration of scale of greenfield land lost and location of brownfield land).
42. As set out in section 5 of the Brownfield and Urban Land Topic Paper [\[CD 3.83\]](#), the review of potential site allocations has been wide-ranging, covering all submitted brownfield sites (including those that were discounted from the earlier SHELAA to check if potential for higher-density development to meet allocations threshold, further site submissions, (including those submitted by Save Capel – see pages 27/28 of the Topic Paper) and a review of potential capacities on proposed brownfield site allocations, for both residential and mixed uses.
43. Following this work, the Submission Local Plan identifies 20 sites on brownfield land for allocation for housing, which will provide a significant number, some **1,422**, dwellings (as shown in Appendix 2).

### Extant planning permissions on brownfield land

44. As well as considering site allocations, The Housing Supply and Trajectory Topic Paper [\[CD 3.74\]](#) takes into account the contribution that will be made to the housing supply through extant permissions.
45. More detailed information regarding extant permissions that will contribute to the delivery of housing throughout the plan period is set out in [The Housing Delivery Test](#)

[Action Plan 2019/2020](#). This records some 313 sites on brownfield land across the borough (at 01 April 2020), equating to **1,582** dwellings.

### Windfall Allowances

46. The NPPF supports the contribution that small and medium sites can make to the delivery of housing (paragraph 69). Paragraph 71 states that:
- “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply.”*
47. In line with the NPPF, section 4 (pages 12-15) of the Brownfield and Urban Land Topic Paper [\[CD 3.83\]](#) considers both historic windfall delivery rates and expected future trends. Importantly, it extends previous consideration of windfall sites to look at both small (one to nine dwellings) and larger (10+ dwellings) sites.
48. The Topic Paper analyses actual completions between 2006/7 and 2018/19, as well as considering trends resulting from changes to planning legislation, in terms of Permitted Development Rights and the Use Class Order, and land supply more generally. Paragraphs 6.5 to 6.21 of the Brownfield and Urban Land Topic Paper set this out in more detail.
49. The conclusion of this work was that there is compelling evidence to make a small sites allowance (one to nine dwellings) of an overall windfall allowance of 1,310 dwellings over the plan period, as well as a larger windfall allowance for larger sites of 360 dwellings.
50. Hence, the total windfall sites allowance, which is essentially of brownfield and underutilised urban land, amounts to **1,670 dwellings** over the plan period.
51. These figures are set out in Table 1 of the Housing Supply and Trajectory Topic Paper. [\[CD 3.74a-b\]](#).

### **Conclusion**

52. As set out above, the combination of approximately 1,422 dwellings on brownfield site allocations, some 1,582 dwellings with extant brownfield permissions, and windfall sites allowances for 1,670 dwellings, gives a combined contribution of **4,674** dwellings to overall housing supply. This is a significant contribution, of some **38%**, to the housing need of 12,204 dwellings (678dpa x 18 years) over the plan period.

53. While there may ultimately be somewhat more housing from windfall sites than estimated, it is considered that there is too much uncertainty about future trends at the present time to rely on higher allowances, whereas the allowances made are supported by compelling evidence that they will be a reliable source of supply.
54. The clear implication of the above is the total housing need of the borough cannot be delivered on brownfield land alone. As explained elsewhere, it cannot be delivered on non-Green Belt or non-AONB land either. Consequently, it was considered necessary to assess amendments to Green Belt boundaries. The rationale for releasing Green Belt land, as well as the existence of exceptional circumstances, is set out in Development Strategy Topic Paper revised October 2021 [[CD 3.126](#) section 6.1] and other hearing statements that have been submitted.



## **Inspector's Question 5: [re. housing capacity beyond the Green Belt]**

***Not all of Tunbridge Wells is within the Green Belt. Could the need for new housing and employment therefore be met by developing beyond the existing Green Belt boundary? If not, why not?***

### **TWBC response to Question 5**

#### **Introduction**

55. The Council has considered the potential for sustainable development beyond the Green Belt and is promoting all suitable, available opportunities within the borough.
56. To avoid repetition, reference is made to the Council's responses to related earlier questions:
- a) Matter 2, Issue 1: Housing Needs and the Housing Requirement, Question 5: re. whether Green Belt and/or AONB policies provide a strong reason for restricting the scale of development [TWLP/011];
  - b) Matter 3, Issue 1: Spatial Strategy, Questions 4, 7 and 8 re. housing potential outside the Green Belt and AONB, including at Paddock Wood [TWLP/014];
  - c) Matter 3, Issue 2; Distribution of Development, Questions 1, 3, 4, 5, 6 re. consideration of development potential in different locations [TWLP/015].
57. As noted at paragraph 15 above, the potential to meet development needs beyond the Green Belt outside the borough is separately addressed through the Council's responses to Questions 1 and 2 in relation to the Hearing Statement for Matter 1, Issue 1 [[TWLP/001](#)] in relation to the Duty to Cooperate.

#### **Consideration**

58. As previously stated in relation to the overall housing requirement, the Council is acutely aware of the importance of protecting the Green Belt from urban sprawl. At the same time, it is also mindful that there are sensitivities in terms of development in those parts of the borough that are not within the Green Belt, most notably in respect of the High Weald AONB, within which most (69%) of the borough lies.

59. Therefore, in answering this question, the capacity for development beyond the existing Green Belt boundary is assessed in terms of its capacity for 'sustainable development'.
60. Potential sources of housing and employment land supply beyond the Green Belt can essentially be seen as being:
- a) within existing built-up areas;
  - b) sites outside of urban limits ('Limits to Built Development') not in the AONB;
  - c) sites outside of urban limits ('Limits to Built Development') within the AONB.
61. The previous question directly relates to (a) above, covering both identified brownfield sites in terms of those that already have planning permission or are put forward as allocations, and unidentified ('windfall') sites that provide a reliable source of supply. As set out in paragraph 52 above, these sources are expected to deliver some 4,663 dwellings over the plan period, equivalent to 38% of the borough's housing need (of 12,204 dwellings).
62. In relation to (b), the potential supply of housing on land outside of both the Green Belt and the High Weald AONB is set out in response to Question 7 under Matter 3, Issue 1: Spatial Strategy [TWLP/014].
63. The most sustainable settlement in this category is Paddock Wood, where the Local Plan promotes strategic growth, essentially maximising its development potential. In total, land is allocated for approximately 3,490-3,590 dwellings, although it is estimated that some 1,575 dwellings (c44%) would be within the current Green Belt. Two employment allocations are also promoted as part of the strategic growth of the town.
64. In respect of the villages in this area, as previously presented (in response to Matter 3, Issue 1, Question 7), their potential for sustainable growth is limited, especially for Sissinghurst and Frittenden, given their accessibility and very rural character. A relatively high level of housing growth (in relation to its services) is proposed at Horsmonden.
65. Development potential within the AONB is addressed specifically in Section H of the Development Strategy Topic Paper [[CD 3.126](#)]. This shows the extent to which the Local Plan tests the development potential in terms of the NPPF's policies and the particular qualities of the High Weald AONB. Indeed, notwithstanding that the Council

believes it has taken a very selective and sensitive approach, it is conscious that Natural England and the High Weald AONB Unit both have outstanding objections to major developments in the High Weald AONB, with the High Weald AONB Unit also objecting to the overall scale of development. Therefore, while these bodies have specific interests (whereas the Council has to weigh all interests), it nonetheless tends to endorse the Council's view that it has pursued all reasonable opportunities for sustainable development in the AONB. The Council is further reassured by several recent appeal decisions relating to AONB development in the borough. This includes dismissals in support of the omission of 'land at the Golf Course', Hawkhurst and at 'land at Gate Farm', Cranbrook from the Submission Local Plan, following consultation on the Draft Local Plan, and the allowing of an appeal at 'land off Copthall Avenue and Highgate Hill', Hawkhurst (the subject of Policy AL/HA 4).

66. Of note, in relation to employment land, the proposed allocation at Kingstanding Way, Royal Tunbridge Wells (under Policy AL/RTW 17), which is currently within the Green Belt, is a unique opportunity, adjoining an existing Key Employment Area and with good trunk road access, as highlighted in the Economic Needs Study [\[CD 3.87\]](#). There is no similar opportunity elsewhere.
67. In summary, opportunities for sustainable development beyond the Green Belt are being supported, while other sites, and broad locations, have been evaluated both through the Sustainability Appraisal and SHELAA processes and found not to be suitable or available. Also, the proper, detailed review of the green Belt has found some opportunities for development without undermining its purposes, in line with the NPPF's provisions.

## **Inspector’s Question 6: [re. regard to promoting sustainable patterns of development]**

***When drawing up or reviewing Green Belt boundaries, paragraph 142 of the Framework states that the need to promote sustainable patterns of development should be taken into account. How and where has the Council taken this into account?***

### **TWBC response to Question 6**

68. The plan-making process as a whole has been guided by seeking to ensure sustainable patterns of development as an integral element of achieving sustainable development, which underpins the NPPF. This process is fully set out in the Council’s Development Strategy Topic Paper [[CD 3.126](#)].
69. It can be seen that the formulation of the development strategy takes account of the role and function of settlements (which are the subject of [CD 3.133](#)), and their capacity for proportionate growth through the SHELAA (which is also addressed in the Council’s response to Question 5 under Matter 3, Issue 2 [TWLP/015]).
70. In addition, the Sustainability Appraisal process, which has been iterative, progressively assesses alternative patterns of development, including in relation to their relationship with the Green Belt.
71. Furthermore, the Green Belt Stage 3 Study [[CD 3.93c](#)], having identified that the release of Green Belt at Paddock Wood and Tudeley Village will result in ‘High’ harm (while the impact of its release on the adjacent Green Belt will be Moderate), these allocations are considered to be highly sustainable, as set out in the Council’s responses in relation to Matter 3, Issue 1 Questions 4 and 5 [TWLP/014].

## **Inspector's Question 7: [re. strategic approach to Green Belt boundary alterations]**

***Having decided to review the Green Belt boundary, how did the Council determine, at a strategic level, where alterations should be made in order to meet housing and employment needs?***

### **TWBC response to Question 7**

72. The need to review Green Belt boundaries stems principally from the identified scale of housing need for the borough, together with the existing pattern of development and the designation of a substantial area (69%) of the borough as an Area of Outstanding Natural Beauty (as well as a significant part of the borough being in the Green Belt).
73. The consideration of potential alterations to Green Belt boundaries was investigated progressively through the three Green Belt studies. Crucially, these investigations were undertaken alongside a range of other assessments to inform the suitability, availability and achievability of land for sustainable development and supporting infrastructure, as set out in the List of Core Documents.
74. Reviews of the Green Belt, in terms of the contribution of broad areas and parcels to its purposes, were undertaken around all the sustainable settlements within or adjacent to the Green Belt. There were three stages of Study, with iterative refinements:
- Green Belt Strategic Study (Stage 1), November 2016 [[CD 3.43](#)]
  - Tunbridge Wells Green Belt Study Stage Two, July 2017 [[CD 3.43b\(i\)](#)]
    - Appendix x A Broad Areas [[CD 3.43b\(ii\)](#)]
    - Appendix A Pembury Five Oak Green Paddock Wood [[CD 3.43b\(iii\)](#)]
    - Appendix A Southborough Langton Green Rusthall Speldhurst [[CD 3.43b\(iv\)](#)]
    - Appendix A Tunbridge Wells [[CD 3.43b\(v\)](#)]
  - Green Belt Study Stage Three - Assessment of Green Belt Allocations, November 2020 [[CD 3.93c](#)]
75. The Sustainability Appraisal (SA) assessment process was carried out both for strategic growth options, including ones in which land was not released from the Green Belt, (see further explanation in Question 5 of the SA Hearing Statement [[TWLP/003](#)]), and also

when assessing individual sites. In both contexts, a score was applied to the Land Use objective which took into account the findings of the Green Belt studies in combination with consideration of whether a potential site allocation would result in harm to soils or loss of greenfield land. The SA process also took into account factors such as “*the need to promote sustainable patterns of development*” and “*previously developed land and that well served by public transport*”, as highlighted in NPPF paragraph 142 in relation to reviewing Green Belts.

76. The Council also applied the guidance in NPPF paragraph 141 in terms of reviewing brownfield and other urban land potentials, and densities, as discussed at Questions 3 and 4 above, as well as investigating the potential for neighbouring authorities to accommodate the likely extent of development needs that would otherwise involve Green Belt release (if those needs were to be met locally), as highlighted at paragraph 15 above.

77. The potential for amending Green Belt boundaries around existing settlements, as well as in relation to the ‘strategic sites’, is reviewed in Section I of the Development Strategy Topic Paper [[CD 3.126](#)]. It highlights at paragraph 6.177 (on paginated page 56) a number of factors, based on case law, that the Council has had regard to in determining whether there are exceptional circumstances for amending Green Belt boundaries. For ease of reference, these are:

- *“The acuteness/intensity of the housing need*
- *The inherent constraints on supply/availability of land suitable for delivering sustainable development*
- *The consequent difficulties in achieving sustainable development without impinging on the Green Belt*
- *The nature and extent of the harm to the Green Belt which would be lost if the boundaries were reviewed*
- *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent”*

78. Paragraph 6.183 of the Topic Paper sets out the key factors that together provide the basis for establishing exceptional circumstances to alter Green Belt boundaries. In summary, these relate to:

- a) The borough is heavily constrained – aside from the Green Belt, 69% of the borough is AONB, with 74.5% of Green Belt land also being within the AONB.

Moreover, the majority of the Green Belt wraps around the main urban area of Royal Tunbridge Wells and Southborough, around Pembury and the area to the east of Tonbridge/west of Paddock Wood (located within Capel parish), the eastern boundary immediately adjoining the existing western edge of Paddock Wood.

- b) Virtually any growth of the more sustainable parts of the borough, in terms of accessibility and provision of services, would impact on the Green Belt and/or the AONB.
- c) Development requirements are higher than for previous Local Plans – in fact, the housing need identified through the Standard Method is more than double that required by the current Core Strategy 2010. Also, there is a need for further employment land to be provided to support the creation of new employment opportunities alongside the provision of housing and also limiting the need for people to commute, requiring identification of suitable land in sustainable locations.
- d) Without the release of land currently located within the Green Belt, the Council will be unable to meet the identified development needs of the borough in a planned and integrated way, primarily for meeting the borough’s housing needs but also for employment uses and delivering a secondary school.
- e) Neighbouring local authorities have confirmed that they are unable to meet any of TWBC’s housing needs, following this Council’s approaches about their capacity in an effort to reduce pressure on the borough’s Green Belt (and AONB).
- f) All reasonable options to deliver development within the borough without releasing land in the Green Belt have been fully examined and utilised. In summary, these are:
  - i. A robust provision for windfall development is made, which will promote development within existing built-up areas; also, the potential for more brownfield development has been reviewed as part of this work.
  - ii. The densities of proposed allocations have been reviewed, and there are specific requirements in policies to seek opportunities to deliver high density development around settlement centres and other key points. Furthermore, the proposed Housing Density policy (Policy H2) requires that development should make efficient use of land.

- iii. The Local Plan promotes suitable and deliverable brownfield allocations.
  - iv. The opportunities for sustainable growth in the area outside the Green Belt (and AONB) have been maximised, with a notably high level of growth, relative to its size, at Horsmonden.
  - v. A significant number of site allocations are being made in the AONB, including for some 'major' developments, but it is concluded that there is no capacity to deliver additional development beyond that which is already being proposed.
  - vi. The SHELAA and the Sustainability Appraisal (SA) have identified all suitable sites outside the Green Belt (and, for major sites, outside the High Weald AONB).
- g) Ensuring all land is appropriately used, including delivering a balance between residential, employment and other land uses, including for the necessary supporting infrastructure, that meets identified needs.
79. Of note, during preparation of the Draft Local Plan, it appeared that the only reasonable option for a new settlement (other than the strategic growth of Paddock Wood) was that submitted for Tudeley Village. Hence, this option required detailed investigations of its appropriateness, including in terms of its contribution to the Green Belt and the potential for alterations such that remaining Green Belt would continue to meet Green Belt purposes. The additional specific factors relevant to the exceptional circumstances for Green Belt releases in respect of these sites are reviewed at paragraph 6.186 of the Development Strategy Topic Paper [\[CD 3.126\]](#).
80. Further detail regarding the consideration of Green Belt in the context of these strategic sites will be set out under Matter 6, both in the Council's responses to Issue 1, Questions 4-8 (re. Tudeley Village) [TWLP/022] and Issue 3 Questions 4-7 (re. Paddock Wood) [TWLP/024].
81. In addition to the strategic factors at paragraph 78 above, further local and site-specific factors were also considered, as highlighted at paragraph 6.187 of the Topic Paper.
82. Of note, in relation to overall development needs, the Economic Needs Study [\[CD 3.87\]](#) identified what may be considered a strategic opportunity for employment development



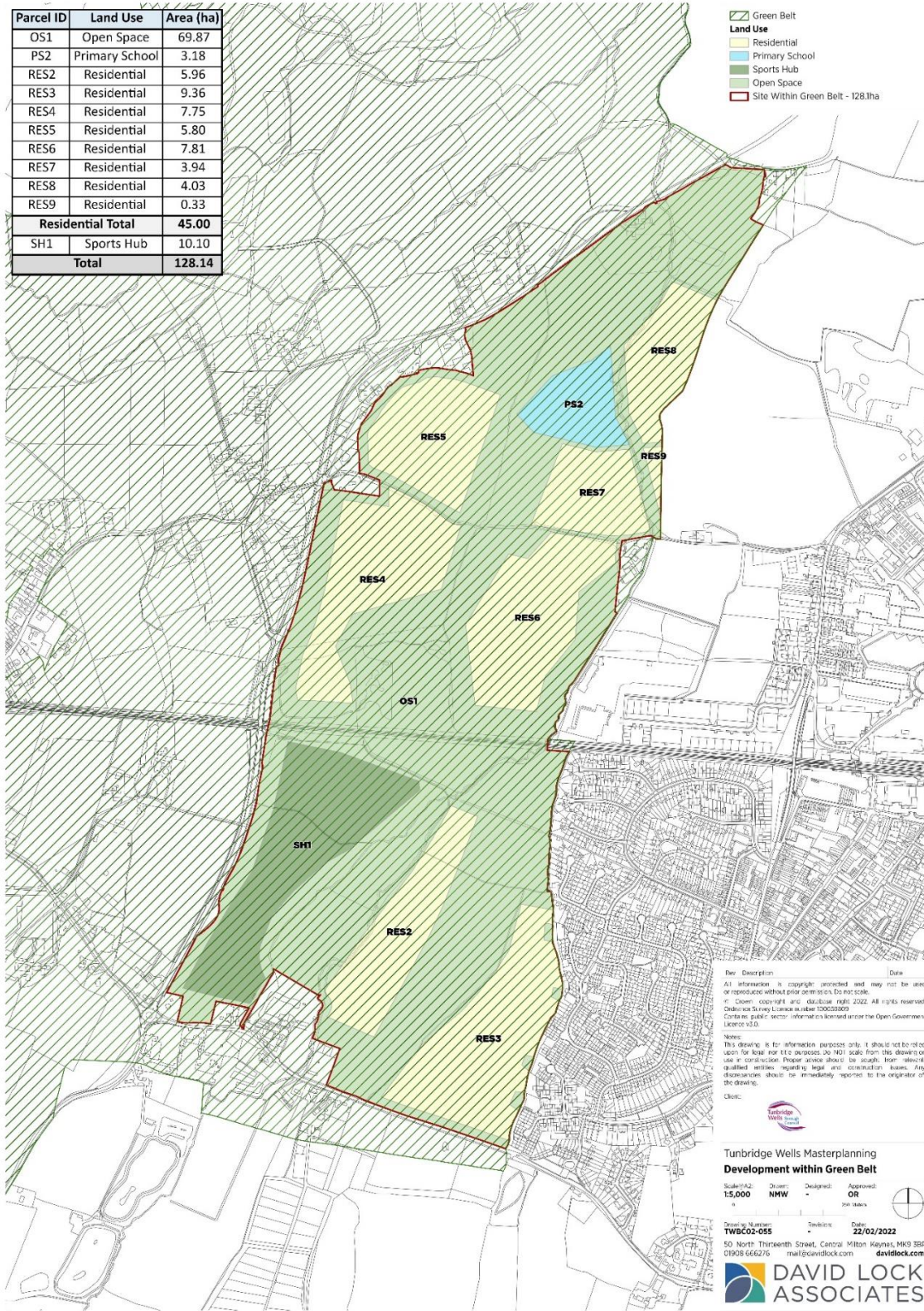
adjoining the existing Key Employment Area of North Farm at Royal Tunbridge Wells, which led to a focused assessment of its contribution to Green Belt purposes.

83. All amendments to the Green Belt boundary are explained in Section I of the Topic Paper at paragraph 6.189 onwards.

# Appendices

# Appendix 1: Masterplanning drawing by David Lock Associates - Development within the Green Belt

Parcel ID	Land Use	Area (ha)
OS1	Open Space	69.87
PS2	Primary School	3.18
RES2	Residential	5.96
RES3	Residential	9.36
RES4	Residential	7.75
RES5	Residential	5.80
RES6	Residential	7.81
RES7	Residential	3.94
RES8	Residential	4.03
RES9	Residential	0.33
<b>Residential Total</b>		<b>45.00</b>
SH1	Sports Hub	10.10
<b>Total</b>		<b>128.14</b>



## Appendix 2: Table Showing Overall Total of Dwellings on Brownfield Land (Brownfield Site Allocations, and Windfall Allowances for Smaller and Larger Sites)

Local Plan Policy Reference/Planning Application Reference	Site Address	Number of dwellings (NB. The mid-point is given where a range is used.)
AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road) East End, Beneden	24
AL/BE 4	Land at Benenden Hospital (north of Goddards Green Road) East End	24
AL/HA 1	Land at the White House, Highgate Hill, Hawkhurst	42
AL/HA 2	Brook House, Cranbrook Road, Hawkhurst	25
AL/PE 5	Land at Sturgeons fronting Henwood Green Road, Pembury	19
AL/PE 6	Woodsgate Corner, Pembury	120 (if residential care/nursing care) 80 (if extra care)
AL/PE 7	Land at Cornford Court, Cornford Lane, Pembury	68
STR/RTW 2	The Strategy for Royal Tunbridge Wells Town Centre	175
AL/RTW 1	Former Cinema Site, Mount Pleasant Road	100
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road, Royal Tunbridge Wells	100
AL/RTW 4	Land at 36-46 St John's Road, Royal Tunbridge Wells	89
AL/RTW 7	Land at the Gas Works, Sandhurst Road, Royal Tunbridge Wells	185
AL/RTW 11	Former Plant and Tool Hire, Eridge Road, Royal Tunbridge Wells	45

<b>Local Plan Policy Reference/Planning Application Reference</b>	<b>Site Address</b>	<b>Number of dwellings</b> (NB. The mid-point is given where a range is used.)
AL/RTW 12	Land at Tunbridge Wells, Telephone Engineering Centre, Broadwater Down, Royal Tunbridge Wells	50
AL/RTW 13	Turners Pie Factory, Broadwater Lane	100
AL/RTW 15	Land at Showfields Road and Rowan Tree Road	155
AL/RTW 20	Land at Culverden Stadium, Culverden Down	30
AL/RU 1	Lifestyle Motor Europe, Langton Road, Rusthall.	15
AL/SO 3	Land at Baldwin's Lane, North Farm Lane, Southborough	26
STR/SS 2	The Strategy for Paddock Wood Town Centre	30
	Total on allocated sites	1,422
	Total small site windfall allowance	1,310
	Total large site windfall allowance	360
	Overall total of dwellings on brownfield land	<b>3,092</b>
	Dwellings on brownfield land as an overall percentage of housing need (12,204)	<b>25%</b>

## Appendix 3: Dwellings per hectare on brownfield sites allocated for residential development

Local Plan Policy Reference	Site Address	Number of dwellings (NB. The mid-point is given where a range is used.)	Dwellings per hectare on site
AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road) East End, Benenden	24	23
AL/BE 4	Land at Benenden Hospital (north of Goddards Green Road) East End	24	14
AL/HA 1	Land at the White House, Highgate Hill, Hawkhurst	42	70
AL/HA 2	Brook House, Cranbrook Road, Hawkhurst	25	39
AL/PE 5	Land at Sturgeons fronting Henwood Green Road, Pembury	19	41
AL/PE 6	Woodsgate Corner, Pembury	120 if residential care/nursing care) 80 if extra care)	50 (if residential care/nursing home) 33 (if extra care)
AL/PE 7	Land at Cornford Court, Cornford Lane, Pembury	68	66
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road, Royal Tunbridge Wells	100	222
AL/RTW 4	Land at 36-46 St John's Road, Royal Tunbridge Wells	89	197
AL/RTW 7	Land at the Gas Works, Sandhurst Road, Royal Tunbridge Wells	185	103

<b>Local Plan Policy Reference</b>	<b>Site Address</b>	<b>Number of dwellings</b> (NB. The mid-point is given where a range is used.)	<b>Dwellings per hectare on site</b>
AL/RTW 11	Former Plant and Tool Hire, Eridge Road, Royal Tunbridge Wells	45	115
AL/RTW 12	Land at Tunbridge Wells, Telephone Engineering Centre, Broadwater Down, Royal Tunbridge Wells	50	46
AL/RTW 20	Land at Culverden Stadium, Culverden Down	30	19
AL/RU 1	Lifestyle Motor Europe, Langton Road, Rusthall.	15	47
AL/SO 3	Land at Baldwin's Lane, North Farm Lane, Southborough	26	57