

Tunbridge Wells Borough



Tunbridge Wells Borough Council

**Development Strategy Topic Paper  
for Pre-Submission Local Plan**

**February 2021**



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# 1.0 Introduction

- 1.1 This Topic Paper explains the background to the proposed 'Development Strategy' in Section 4 of the Pre-Submission Local Plan.
- 1.2 It sets the context for the future development of the borough and shows how the proposed development strategy has evolved as the consequence of an iterative process, drawing on consultation responses to the earlier 'Issues and Options' and 'Draft Local Plan' documents, the outcomes of a range of studies and reports, specific site assessments (under the Strategic Housing and Economic Land Availability Assessment), due regard to relevant national policies and guidance and recommendations from the Sustainability Appraisal (SA). It updates the earlier topic paper produced for the Draft Local Plan.
- 1.3 Particular consideration has been given to the potential to accommodate development needs within the borough, notably for housing while also, where appropriate, prioritising opportunities for economic growth, without undue impacts on the functioning and purposes of the Green Belt and the defining characteristics of the High Weald Area of Outstanding Natural Beauty (AONB), and without exacerbating flood risk. Connectivity and the capacity of infrastructure, including transport, utilities, schools, and other community services/facilities has also contributed to the preparation of the proposed strategy, including assessments of future infrastructure requirements generated by proposed development, and how these will be delivered.
- 1.4 This Topic Paper should be read in conjunction with other evidence studies and documentation (e.g. the Infrastructure Delivery Plan, various other Topic Papers and consultancy reports) produced to inform and support the Pre-Submission Local Plan. All supporting documents referred to throughout this document can be found under [Supporting Documents](#) on the Council's Local Plan web page.

## 2.0 Settlement pattern

- 2.1 The estimated population of the borough in 2020 was 118,850 (ONS), with circa. 51,000 dwellings (TWBC).
- 2.2 Royal Tunbridge Wells and Southborough form the Main Urban Area within the borough, with the former having the principal retail centre. Southborough has a separate, smaller town centre, as well as local 'neighbourhood centres' at High Brooms and north Southborough.
- 2.3 Paddock Wood benefits from good transport links and higher order facilities, such as a secondary school and sports centre. There is a large employment area to the north of the railway line. Cranbrook is an attractive, vibrant rural town located within the High Weald AONB, benefitting from a range of facilities. Hawkhurst is also located within the High Weald AONB and provides local services for the immediate rural area. The borough also has a variety of village settlements and a number of hamlets and other more remote clusters of buildings and farmsteads dispersed across the borough.
- 2.4 The adopted Core Strategy (June 2010) ([view the Core Strategy](#)) identified a settlement hierarchy which differentiated between the 'Main Urban Area' (Royal Tunbridge Wells, Southborough), 'Small Rural Towns' (Cranbrook, Paddock Wood and Hawkhurst), and a list of 'Villages'.
- 2.5 Recognising that services can change over time, with implications for a settlement's function, the Council has prepared an updated 'Settlement Role and Function Study' to inform the Pre-Submission Local Plan (itself an update from a similar study in 2017. This not only updates the understanding of settlement pattern and hierarchy, but also provides an indication of each settlement's level of sustainability.
- 2.6 On the basis of the findings of this Study, groupings of settlements in terms of the existing services and facilities that they provide are identified.

Table 1: Groupings of settlements the Role and Function Study (2021)

Grouping	Settlement
A	Royal Tunbridge Wells (RTW) *
B	Southborough*, Cranbrook, Paddock Wood and Hawkhurst
C	Rusthall and Pembury
D	Goudhurst, Langton Green, Benenden, Brenchley and Horsmonden
E	Lamberhurst, Speldhurst, Sandhurst, Five Oak Green, Sissinghurst, Bidborough
F	Matfield and Frittenden
G	Kilndown and Iden Green

- 2.7 This confirms the distinct, sub-regional role of Royal Tunbridge Wells, with Southborough being more akin to Cranbrook, Paddock Wood and Hawkhurst in terms of its functions. Rusthall and Pembury are identified as having a notably broader range of services than other villages.
- 2.8 At the other end of the scale, the very low level of services at Iden Green and Kildown have substantially contributed to the proposal to remove their Limits to Built development (LBDs) are proposed to be removed. Further details are provided in the 'Limits to Built Development Topic Paper'.

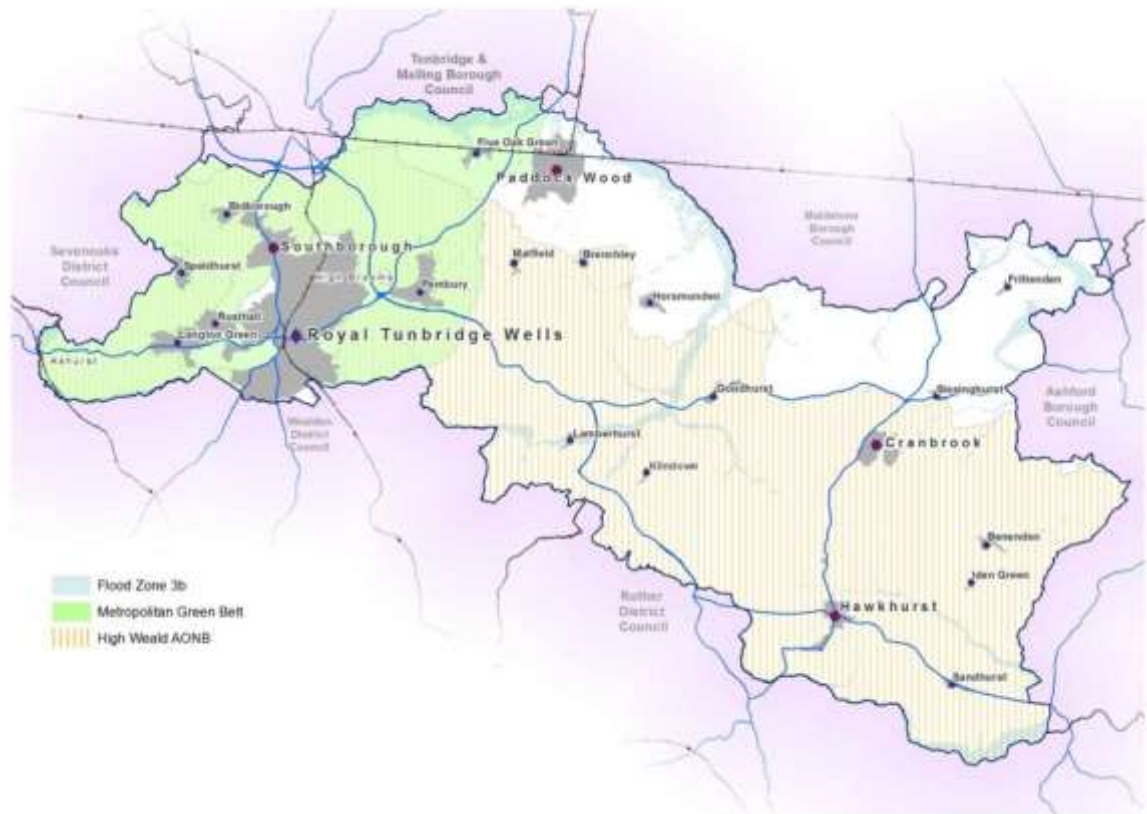


Figure 1: Tunbridge Wells borough and main settlements

- 2.9 While these groupings give an indication of the level of the relative sustainability of settlements in terms of access to goods and services and, hence the need to travel, it can only be a starting point for considering growth potential. Other factors, such as transport, employment/economic, environmental, landscape, heritage and flooding considerations, also need to be assessed to determine potential to accommodate growth. Hence, it may be that the growth of larger settlements is restricted by substantial environmental and/or infrastructure constraints, while suitable sites may exist in smaller settlements, which may become more sustainable as a result of growth that provides new infrastructure/services/employment opportunities.

## 3.0 Environmental designations

- 3.1 A 'Development Constraints Study', published in October 2016, looks at existing environmental factors and designations in terms of their potential to constrain the ability to accommodate development within the borough, taking into account the relevant policies of the National Planning Policy Framework (NPPF). It usefully identifies key designations, including the High Weald Area of Outstanding Natural Beauty (AONB), the Metropolitan Green Belt (generally referred to as the Green Belt), Sites of Scientific Interest (SSSIs), Conservation Areas, and flood zones (although the latter are periodically updated). ([view the Development Constraints Study](#)).

### High Weald Area of Outstanding Natural Beauty

- 3.2 Some 69% of the borough lies within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on Figure 2 below.

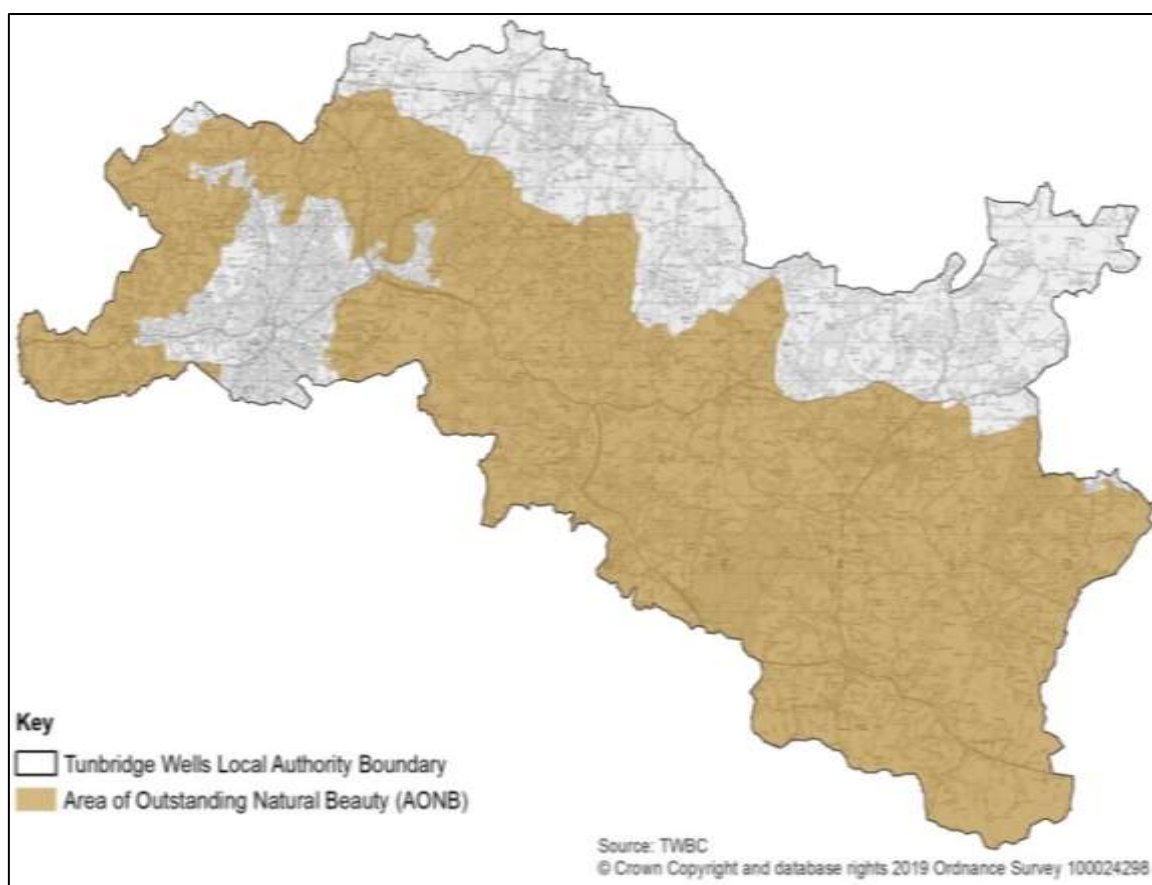


Figure 2: Area of Outstanding Natural Beauty

- 3.3 AONBs, alongside National Parks, represent the country's finest landscapes and have the highest status of protection in relation to conserving and enhancing their landscape and scenic beauty.



- 3.4 This status is reflected in the NPPF at paragraph 172, which sets out that “*great weight*” should be given to conserving their landscape and scenic beauty. Moreover, it states that “*the scale and extent of development within these designated areas should be limited*” and that there is a corresponding presumption against major development in them other than in exceptional circumstances, and where it can be demonstrated that the development is in the national interest.

## Metropolitan Green Belt

- 3.5 The Metropolitan Green Belt covers 22% of Tunbridge Wells borough, as shown on Figure 3 below.

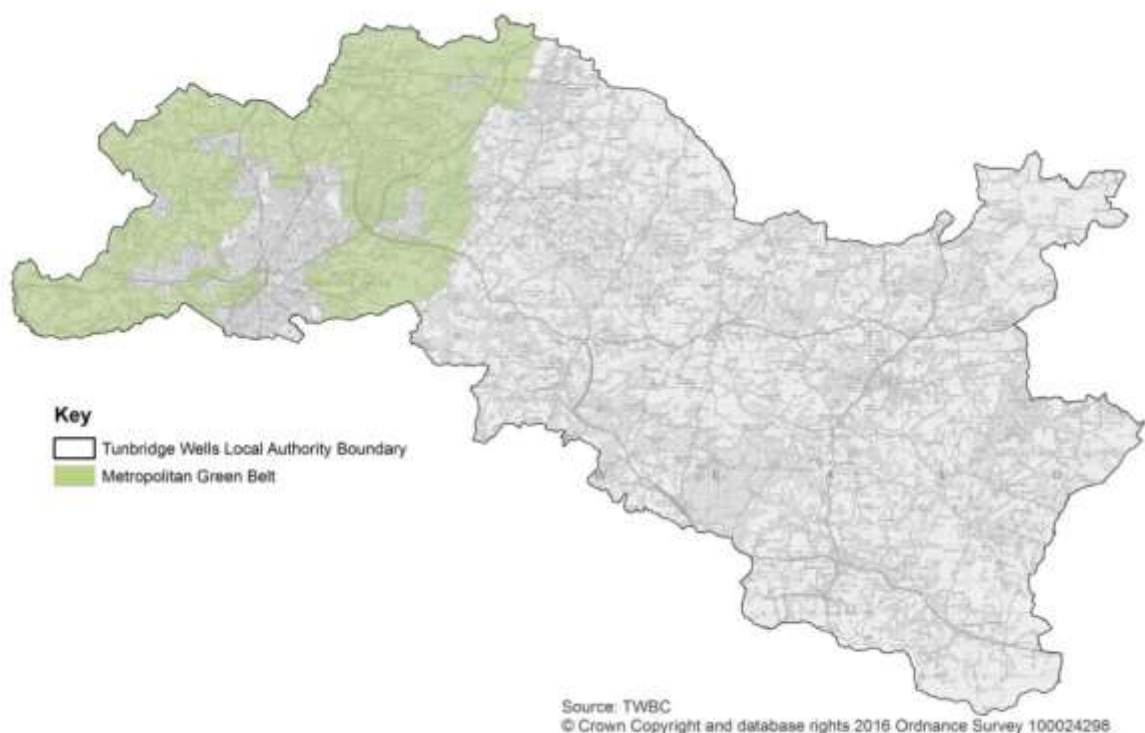


Figure 3: The extent of the Metropolitan Green Belt within Tunbridge Wells borough

- 3.6 There are five well-established purposes of the Green Belt, set out in the NPPF at paragraph 134 ([view the NPPF](#)). These are:
- a) to check the unrestricted sprawl of large built-up areas;
  - b) to prevent neighbouring towns merging into one another;
  - c) to assist in safeguarding the countryside from encroachment;
  - d) to preserve the setting and special character of historic towns; and
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 3.7 National policy (NPPF, paragraph 135) states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The preparation of new strategic policies (such as in the new Local Plan) is the appropriate mechanism for undertaking Green Belt reviews.
- 3.8 On this basis, there is a clear presumption that the Green Belt should remain fundamentally intact, but that it is still necessary for the Council to undertake a study that assesses the current Green Belt boundaries against their purposes and functions. At the same time, the removal of land from the Green Belt may only be considered where other reasonable options for meeting development needs have been fully explored, as set out in paragraph 137 of the NPPF. This includes making as much use as possible of brownfield land and highly accessible sites, as well as exploring the potential for neighbouring authorities to meet some of the identified need for development.

## Nature Conservation designations

- 3.9 The borough has a number of, or is close to, areas of ecological importance, which are illustrated on Figure 4 below.

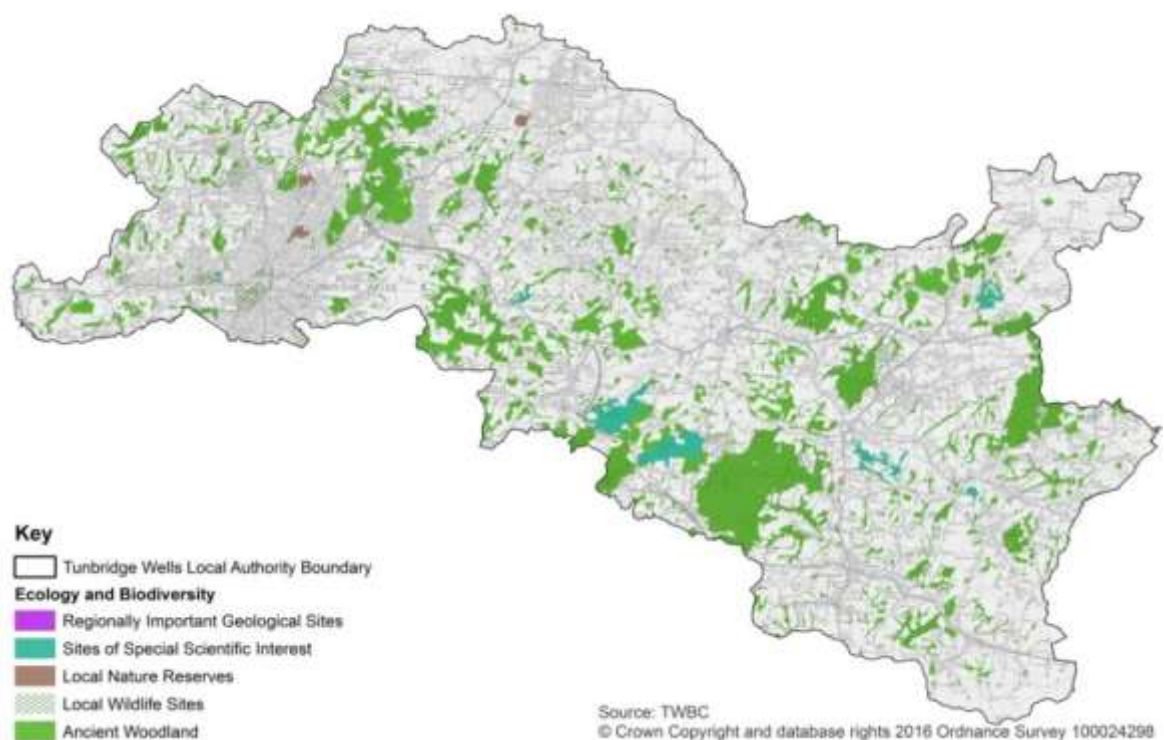


Figure 4: Nature Conservation designations within, or close to, Tunbridge Wells borough

- 3.10 While there are no European sites for nature conservation actually within the borough, Ashdown Forest is located to the south west of the borough (within Wealden District Council administrative area), and is designated as both a Special Area of Conservation (SAC) and Special Protection Area (SPA).



- 3.11 In relation to the SPA, the Council is, in agreement with other local planning authorities and Natural England, applying appropriate mitigation measures to any new residential development within a 7km buffer zone around the Forest, as set out in the Habitat Regulations Assessment for the Draft Local Plan ([view the Habitat Regulations Assessment](#)). This is to offset the potential impact of additional recreational pressures on its sensitive habitats. Consideration is also given to the ecological impact of additional traffic movements upon air quality across the SAC, also in conjunction with neighbouring areas.
- 3.12 There are 10 nationally important Sites of Special Scientific Interest (SSSI) in the borough, as well as substantial areas of irreplaceable Ancient Woodland (covering some 16% of the borough), largely associated with the High Weald AONB, of which it is a key characteristic. Additionally, there are approximately 60 Local Wildlife Sites (approximately 11% of the borough) five Local Nature Reserves and one Regionally Important Geological Site, at Scotney Castle.
- 3.13 National policy supports legislative provisions in severely restricting development in, or otherwise likely to have an adverse impact on, sites that carry an international or national designation, including SAC, SPA and SSSIs. (paragraphs 174-177 of the NPPF) Similar restrictions also apply to Ancient Woodland. Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves, which are all locally designated, must also be given appropriate consideration by the Local Planning Authority.

## Heritage designations

- 3.14 There are a number of archaeological and heritage sites within the borough. These include 45 Historic Parks and Gardens, 25 Conservation Areas, 11 Scheduled Ancient Monuments and approximately 3,000 listed buildings.
- 3.15 NPPF chapter 16 highlights that such heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

## Areas of flood risk

- 3.16 There is policy emphasis in the NPPF (paragraph 155) to steer development, notably housing, away from areas with higher flood risk, defined as being Flood Zone 3.
- 3.17 Nearly 7% of the borough is in Flood Zone 3, as shown in the Tunbridge Wells Strategic Flood Risk Assessment, these areas being mapped on Figure 5 below.

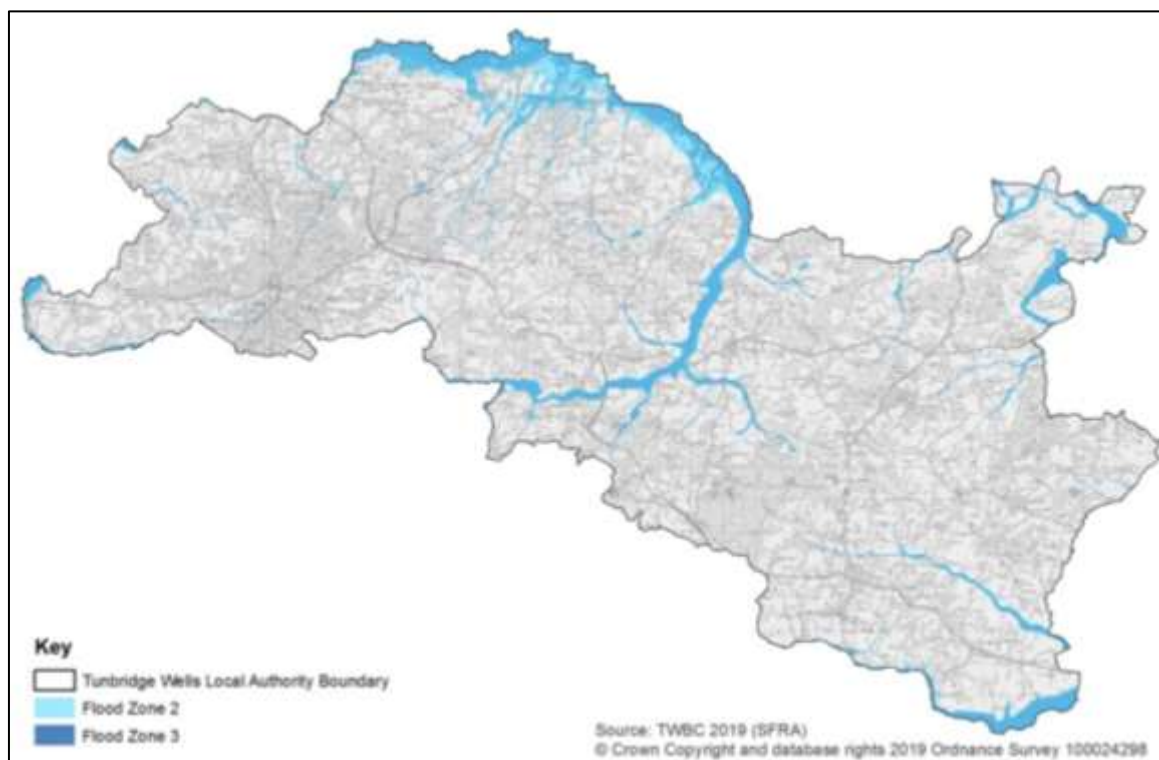


Figure 5: Flood Risk Zones (taken from the Strategic Flood Risk Assessment)

# 4.0 Development needs

## Housing

- 4.1 National planning policy, as set out in paragraphs 60 and 61 of the NPPF, requires that local planning authorities should assess the housing needs within their areas in terms of both the amount and types of housing needed, while paragraph 67 expects them to have a clear understanding of the amount and location of land that is available for housing.
- 4.2 The local housing need for the borough over the plan period, 2020 – 2038, is 12,204 dwellings (678 per year), identified by the Standard Method (based on 2014 projections as required by the NPPF). This figure does not include any unmet need from other areas. Further explanation and analysis of local housing needs and any unmet needs from neighbouring areas, target, as well as assessments of the housing needs of particular groups, is set out in the Housing Needs Assessment Topic Paper (see [Housing Needs Assessment Topic Paper](#)).
- 4.3 The need for new site allocation that would be required to meet the local housing need can be calculated by deducting extant planning permissions, existing site allocations in adopted Local Plan that have not yet received planning permission, and by taking account of a robust windfall sites allowance. As at the base date of the Local Plan (1 April 2020), this gives a total of 6,945 additional dwellings needing to be allocated if the local need is to be met exactly by the end of the plan period. This figure increases to 7,221 dwellings to include existing site allocations that would need to be reviewed/reallocated. These figures are set out in the Housing Supply and Trajectory Topic Paper (see [Housing Supply and Trajectory Topic Paper](#)).

## Business

- 4.4 An Economic Needs Study (ENS) was prepared, jointly for Sevenoaks and Tunbridge Wells Borough Councils in 2016 to inform the Local Plan and make recommendations for the future provision of employment land (use classes B1, B2, and B8) across the borough ([see Economic Needs Study](#)). This has regard to the desirability of facilitating economic growth and increasing the choice of sites to ensure that the needs of different sectors can be met as far as possible over the plan period.
- 4.5 The findings of the ENS have been reviewed and updated, taking account of more recent work, in the [Employment Topic Paper](#). This recommends that a minimum target for new employment land over the plan period (2020 -2038) should be accommodate at least 14 hectares, with further consideration of the mix and distribution of sites.

# Retail

- 4.6 The retail and leisure needs of the borough were assessed through the 'Retail and Leisure Study', produced in 2017. This assessed needs for both comparison (clothing, footwear, electrical goods, etc.) and convenience shopping (food, drink, etc.), including having regard to the current 'health' of the key centres within the borough. While having a retail focus, the study also set out broad leisure requirements and highlights the importance of cultural and leisure activities in supporting the mix of uses within town centres.
- 4.7 However, since then, it is recognised that the retail and commercial market has been in a state of change. Therefore, the Council has commissioned, and very recently received, a 'Tunbridge Wells Retail, Commercial Leisure & Town Centre Uses Study Update'. Of particular note given the scale and mix of uses that make up the town centre of Royal Tunbridge Wells, it recommends that a specific set of proposals be developed for the town centre by way of a Town Centre Area Plan. This should be produced over the next couple of years, to be developed through a wide-ranging public consultation exercise and to take account of the implications of recent trends and how these modify going forward, become clearer.
- 4.8 Elsewhere, the Study also recognises in particular the importance of Paddock Wood town centre and the role that it has in supporting the growth proposed for the town and the wider area.

# 5.0 Development of the strategy through previous stages

## A. Issues and Options consultation

- 5.1 The first stage in the process of preparing the new Local Plan was the publication of an [Issues and Options](#) document. This set out initial thoughts about what the Local Plan should contain and the issues it should address. It also set out a number of possible options for where and how the future growth might be located.
- 5.2 A six-week consultation on this document ran from 2 May to 12 June 2017. The 'Issues and Options Consultation Statement' provides an overview of the public consultation on the Issues and Options document, informing who and how the Council consulted, what consultation material was used, how comments received have been considered and an evaluation of the consultation. Part 2 provides a summary of the comments received and the Council's initial response to those comments. These responses are supplemented in the Consultation Statement published alongside the Draft Local Plan, and available on the Council's website ([see the Issues and Options Consultation Statement](#)).
- 5.3 The information and analysis provided below is with reference to those consultation questions in the Issues and Options document relating directly to the formulation of the Development Strategy in the Draft Local Plan set out in Chapter 4 and in Policy STR1, which provides the overarching Development Strategy.
- 5.4 Questions 1 and 2 related to the draft Vision for the borough (as set out in that document) and suggestions for improving or updating the Vision. Key issues identified in the responses included:
- Too much focus on Tunbridge Wells and Paddock Wood – the Vision needs to ensure it illustrates how development will take place across the borough and address the needs of rural villages
  - Place greater emphasis on role of the main urban area as a strategic location within a wider context of Kent and east Sussex
  - Vision should be balanced to both developing existing built town areas and preservation of surrounding countryside and unique historic villages
  - A number of different comments relating to constraints presented by the AONB and need to protect the Green Belt
  - Vision should look how the borough will develop over a much longer period beyond the proposed Local Plan
  - Vision should include reference to development and provision of additional infrastructure



- 5.5 Question 10 related to the five strategic options for delivery presented in the Issues and Options document, asking for comments on the preferred option or combination of options in order of preference, the strategic options being:
- 1) Focused Growth
  - 2) Semi-Dispersed Growth
  - 3) Dispersed Growth
  - 4) Growth-Corridor Led Approach
  - 5) New Settlement Growth
- 5.6 The strategic options presented took account of the evidence base compiled at that time and in accordance with the NPPF, the starting point was to meet the identified level of development needs in full unless there were good planning reasons why this would not be sustainable, for example because of development constraints. Although five possible options were presented, it was pointed out that a combination of two or more of the options may form the final preferred strategy to meet the identified growth within the new Local Plan. The main outcomes of the consultation for this question were:
- The most preferred option (60%) was Option 4 (growth corridor led approach)
  - 18% ranked Option 5 (new freestanding settlement) as most preferred approach, 13% ranked Option 1 (focussed growth), 8% Option 3 (dispersed growth) and 1% (semi dispersed growth) as their most preferred option
  - For a combination of options approach, 47% chose Option 4 (growth corridor) and Option 5 (new settlement) as their preference
  - 20% chose a combination of Option 4 (growth corridor led approach), Option 3 (dispersed growth) and Option 1 (Focused growth) as their preference
  - A number of other combinations were all suggested by approximately 4% of the respondents (full details listed in the Consultation Report)
- 5.7 Overall, there was a range of preferred combinations of strategic options among respondents, with the majority of those who expressed an opinion choosing a combination of Option 4 (growth corridor) and Option 5 (new settlement) as their preference.
- 5.8 Question 11 asked for views about the possibility of a new settlement somewhere in the borough providing for future development needs. Key issues referred to across the response groups included:
- Infrastructure issues: implementation and higher-level funding to deliver infrastructure before buildings; would need excellent transport links
  - Could result in large development on greenfield land; should be located outside AONB and Green Belt (with comments that there is no suitable land in borough – would destroy rural character)

- Should be sustainable mixed development to also provide employment with options for future expansion. Should be a stand-alone, self-sufficient development planned as a whole
  - Should only be delivered once all development potential has been maximised
- 5.9 Question 11a then asked for suggestions for the location of a new settlement. Responses included many different locations within the borough, some based on existing transport links and good access to other infrastructure.
- 5.10 Question 12 asked: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough? In summary, the responses were that 48% of respondents agreed that all reasonable options for accommodating future growth have been identified and considered, while a slight majority, 52%, disagreed; the reasons for disagreement were sought through Question 12a.
- 5.11 Question 12a asked: If no, please set out what other options for accommodating future development growth within the borough you think should be considered. A summary of responses included:
- Need for substantial level of growth to be delivered by Local Plan questioned
  - Meeting need takes no account of constraints such as AONB, landscape character, jobs, services, traffic, etc.
  - Needs to be a firm policy of brownfield first; also need to look at scope for increasing densities in existing settlements
  - Focus development in main urban area (Royal Tunbridge Wells and Southborough) with a subsidiary focus in small towns and villages, with small scale development in smaller villages, and overall focus on sustainable locations
  - Role of farmsteads and hamlets, including modern farm buildings should be addressed
  - Need to look at potentially better options just outside the borough
  - More focus on A21 corridor
- 5.12 The main issues and themes identified in the responses to the Issues and Options consultation were used to inform the formulation of the development strategy included in the Draft Local Plan, also produced as part of ongoing work under Regulation 18 of the local planning regulations. This process, together with responses to consultation on it, is set out below.

## B. The Draft Local Plan

- 5.13 Building on the Issues and Options document and the feedback received to that, the Borough Council undertook a second stage of consultation, still under Regulation 18, on a comprehensive [Draft Local Plan](#).
- 5.14 This Draft Local Plan put forward a proposed strategy for the future development of the borough, including draft site allocations and topic-based policies for use in Development Management.
- 5.15 The Draft Local Plan sought to meet development needs as much as possible within the context of the various constraints in the borough, including the Green Belt, Area of Outstanding Natural Beauty (AONB) and areas of flooding. In view of the evident limitations on the growth of existing settlements relative to the identified local housing need, together with the fact that feedback from the earlier consultation on an 'Issues and Options' document gave "in principle" support for a new settlement, options for potential locations were evaluated. This resulted in two proposals for strategic growth, one involving the substantial, transformational growth of Paddock Wood extending into Capel Parish and the other being a new village between Five Oak Green and Tonbridge.
- 5.16 The substantial expansion of Paddock Wood was seen as benefitting from taking a comprehensive, integrated approach to growth of the town in order to effectively address transport, flood risk and other infrastructure provision, as well as to help provide an economic stimulus. It included extending into the existing Green Belt, for which exceptional circumstances were considered to exist. This also applied to the land at Tudeley being proposed for a new village, as it is wholly within the Green Belt (and similarly outside the AONB). Both were proposed to be delivered through a masterplanned approach, applying garden settlement principles.
- 5.17 The Draft Local Plan also put forward proposals for significant growth in many towns and villages. This included some 17 larger proposals, which were recognised as 'major developments' at settlements in the AONB, most notably concentrated at Cranbrook and Hawkhurst, but also involving some relatively significant growth at a number of smaller settlements.
- 5.18 The consultation period ran from 20 September to 15 November 2019, a total of 8 weeks. There was a substantial response to the Draft Local Plan as a whole. All comments can be viewed on the Council's consultation portal and are summarised in the 'Consultation Statement for the Pre-Submission Local Plan'.
- 5.19 In relation to the proposed overall development strategy (rather than individual site allocations), the main issues raised in comments were, most notably:

- The scale of proposed growth across the borough attracted a lot of objections and concerns, with many local people and organisations believing that it is incompatible with the protection afforded to Areas of Outstanding Natural Beauty and Green Belt in particular, highlighting national policy statements, as well as with climate change objectives.
- The availability of infrastructure, including proposed infrastructure improvements, to support the growth was widely questioned.
- There was also a significant level of questioning of the scale of proposed growth in terms of the validity of what were regarded as dated figures underpinning the Government's standard method of calculating housing need.
- The development industry argued for higher housing growth, due to a heavy reliance on the strategic sites, that the housing need figure is 'capped' and there is a higher need to address housing affordability.
- There was a considerable level of objection to the strategic growth proposals, notably the new village and extension of Paddock Wood into Capel parish.
- Concerns about the impact of the overall scale of development on the AONB were mirrored in comments about the broad distribution of development, with many drawing attention to the NPPF statements in relation to limited growth and the tests of 'exceptional circumstances', which are not regarded as being met by proposed allocations. There were also some comments that only local needs should be met in the AONB.
- Another frequent criticism related to the adoption of the 'dispersal' strategy option approach, which is seen as inconsistent with directing growth to more sustainable settlements.
- The main urban area of Royal Tunbridge Wells and Southborough was seen by many (often raised in opposing local growth proposals elsewhere) as being expected to accommodate a higher proportion of development. There were also several comments about needing to further review opportunities in the A21 corridor.
- Further potential for brownfield development and intensification, notably in central locations, was suggested by several respondents.

# 6.0 Formulating the development strategy for the Pre-Submission Local Plan

## A. Review of Draft Local Plan strategy/proposals

- 6.1 A thorough review of the comments received to the Draft Local Plan has highlighted a number of areas where further work would help review, refine or simply update the basis of the emerging strategy and/or proposals. In particular:
- a) *Is there a case for not adopting the Government's 'standard method' to determine local housing needs?*
  - b) *Has due consideration been given to sustainable opportunities for meeting the development needs of the borough, as well as any unmet needs for neighbouring areas, through requisite cooperation with relevant authorities, taking account of any changes in circumstances since the Draft Local Plan?*
  - c) *Is the strategic approach justified in relation to both the scale of development and its distribution, notably the identification of strategic growth locations?*
  - d) *Have opportunities to make effective use of brownfield land and, more generally, land within existing settlements, been fully explored? Also, (i) does the approach give due regard to brownfield sites, and (ii) does the allowance sufficiently support the development of windfall sites (in line with NPPF paragraph 68(c)) whilst still being realistic (in line with NPPF paragraph 70)?*
  - e) *Has great weight been given to conserving and enhancing the landscape and scenic beauty of the High Weald AONB and are 'exceptional circumstances' for major developments within it demonstrated (in line with NPPF paragraph 172)?*
  - f) *Is there a sufficiently strong justification for the developments, including those for strategic growth, in the Green Belt to meet the 'exceptional circumstances' test in the NPPF section 13?*
  - g) *Does the development strategy pay due regard to the relative sustainability of settlements and sites?*
  - h) *Does the development strategy adequately reflect climate change objectives, and does it take due account of flood risk??*
  - i) *Is the development strategy realistic and deliverable, with particular regard to infrastructure and phasing considerations?*



## B. Review of local housing need

- 6.2 Section 4 refers to housing need based on the Government's 'standard method'. The NPPF sets out, at paragraph 60, the clear expectation that local plans should apply the standard method for calculating overall housing need:
- 'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.'*
- 6.3 While there were a significant number of challenges to the currency of the standard method in comments on the Draft Local Plan, notably on the basis of more recent, lower population and household projections, the Government has very recently reviewed alternative means of calculation following its consultation on 'Changes to the Current Planning System'.
- 6.4 Its [Response](#), in December 2020, confirms that, outside the 20 largest cities, the current standard method calculation, which uses the 2014-based projections, remains in place. Its main points are that *'... this approach will provide stability and certainty for plan-making and decision-making, so that local areas can get on and plan based on a method and level of ambition that they are familiar with.'* Of note, it also retains the 40% cap on the affordability uplift to household projections.
- 6.5 Alongside its Response, the Government also published the results of the standard method for each local planning authority area. This confirmed that the local housing need for Tunbridge Wells borough is 678 dwellings pa. It is noted that this is a capped figure.
- 6.6 National planning policy, as set out in paragraphs 60 and 61 of the NPPF, requires that local planning authorities should assess the housing needs within their areas in terms of both the amount and types of housing needed, while paragraph 67 expects them to have a clear understanding of the amount and location of land that is available for housing.
- 6.7 At the same time, it can be seen from the extract of paragraph 60 above, that the NPPF is not absolute in its expectation of the use of the standard method figure. Therefore, the Borough Council commissioned consultants, Icen Projects Limited, to advise on whether there were exceptional circumstances to warrant an alternative level of housing need to provide a starting point for planning for housing growth in the borough. Its report - [Review of Local Housing Needs](#) - dated December 2020 is available to view in the Supporting Documents section of the Local Plan website.
- 6.8 Full consideration of consultants' findings is contained in the [Housing Needs Assessment Topic Paper](#). As is stated there, in essence, Icen concludes that there

are not the exceptional circumstances to justify an alternative assessment of housing need that would withstand scrutiny at a future Local Plan Examination.

- 6.9 Of note, Icení advises that while the latest official household projections indicate a slowing rate of household growth, these are seen as a consequence of under-supply nationally, as reflected by higher affordability ratios. Moreover, the Planning Practice Guidance (PPG) highlights that household growth on its own is insufficient as an indicator of future housing need because household formation is constrained by the supply, and cost, of available properties. At the local level, Icení's analysis shows that net migration to the Borough is likely to have been influenced by historic housing delivery, while deteriorating affordability can be assumed to have constrained household formation.
- 6.10 As regards higher rates of growth, Icení notes that 678 dwellings pa represents a high level of housing delivery relative to what has been seen in Tunbridge Wells historically. Nevertheless, it is capable of being achieved from a market capacity perspective. It also finds that while the higher, uncapped need may be achievable, this is moderated by the fact that extensive parts of Tunbridge Wells borough are affected by strategic development constraints, in particular the High Weald AONB; the implication being that most development would inevitably be more concentrated in a limited area, with potential deliverability issues of further growth. The (capped) standard method figure itself represents a 37% increase in recent house-building rates, which would be a very substantial boost in terms of the performance of the local housing market.
- 6.11 In conclusion, it regards as being a realistic but achievable housing need target. It also bears in mind that, in line with NPPF paragraph 60, that this will be a 'minimum' requirement.

## C. Opportunities for meeting development need

6.12 The Borough Council has maintained a dialogue with its neighbouring district/borough councils over respective progress in meeting identified development needs, notably but not exclusively housing, as well as in relation to related infrastructure implications. Full details are set out in its Duty to Cooperate Statement prepared in support of the Pre-Submission Local Plan.

6.13 The focus here is on the further regard (since preparation of the Draft Local Plan) to likely opportunities for meeting development needs in a way that reduces the pressure on Green Belt land and for major development in the High Weald AONB in particular. This looks firstly at need arising within the borough and, secondly, at any unmet need, essentially for housing, from neighbouring areas.

6.14 These considerations have a clear basis in national policy. In respect of Green Belt, NPPF paragraph 137 states that:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

(our underlining)

6.15 In respect of Areas of Outstanding Natural Beauty, NPPF paragraph 172 states:

*“The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development<sup>55</sup> other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

*a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

*b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*

*c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

(our underlining)

6.16 Furthermore, the PPG clarifies the approach in relation to development in AONBs:

*“The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated.*

*All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality. Where applications for major development come forward, [paragraph 172 of the Framework](#) sets out a number of particular considerations that should apply when deciding whether permission should be granted.”*

*Paragraph: 041 Reference ID: 8-041-20190721*

(our underlining)

*Revision date: 21 07 2019*

6.17 While draft assessments suggested that there is capacity for some major (but not strategic) development in the AONB and for some loss of Green Belt without compromising its purposes, the respective ‘exceptional circumstances’ included regard to the need for development to be within those designations. However, this “need” would fall away if neighbouring councils were able to accommodate that development. Therefore, while appreciating the relevant designations impinging on neighbouring councils, formal requests have been made to them in relation to the quantum of development that the Draft Local Plan provided for in these ways.

6.18 Letters were sent to all neighbouring councils in October 2020 (details of which are contained in the Duty to Cooperate Statement. These followed up from respective meetings and drew attention to the emerging proposals for both housing and employment development. While acknowledging likely difficulties, the letters asked if the authorities may be able to accommodate some, or all, of the 4,724 – 5,559 dwellings and at least 14 hectares of employment land that were proposed on currently Green Belt land. It also identified some 1,608 – 1,772 dwellings, and at least 14 hectares of employment land, within major developments (again based on

the Draft Local Plan) and similarly asked about their likely capacity to help accommodate this.

- 6.19 Responses have been received from all neighbouring councils. None indicated a clear potential to assist in meeting any housing needs from the borough, often citing similar environments designations/constraints. References are also made by some to the stage in their plan-making process, whereby either site suitability has recently been reviewed or is at an early stage such that the ability to meet local needs itself is not yet established.
- 6.20 Indeed, Sevenoaks District Council (SDC) has formally requested whether this borough could meet some or all of its presently unmet need, which is currently identified as being 1,900 dwellings. The background to this is further explained in the 'Housing Needs Assessment Topic Paper', as well as in the 'Duty to Cooperate Statement'. In summary, the extent of the unmet need is uncertain, as the Sevenoaks Local Plan has not been endorsed at Examination. This key finding of the Inspector was that it did not meet the Duty to Cooperate Statement in relation to seeking to address its unmet need. However, the Inspector also indicated that there were soundness issues that would need to have been further explored if the examination had proceeded, including ones relating to its assessment of Green Belt capacity.
- 6.21 Overall, it is accepted that is no clear basis for assuming that the borough's housing needs can be met in neighbouring areas.
- 6.22 It is also concluded that the existence and, if confirmed, scale of unmet housing need from Sevenoaks is too uncertain to form part of the housing need for the borough. However, there is still a potential for it to be confirmed, in whole or part, such that it would be prudent to assess the potential to meet this within the borough. This may be done both through the Sustainability Appraisal and through not limiting the assessment of sites to meeting local need. In addition, and crucially, the Borough Council will continue to cooperate with Sevenoaks District Council as it further considers, and advises on, how it expects its housing needs may be met.



## D. Consideration of alternative strategies

### Alternative strategies

- 6.23 As set out at Part A above, while housing need is accepted as being that derived from the standard method – which the Draft Local Plan also applied – it is also accepted that it does not automatically follow that the strategy must meet that need in full within the borough. NPPF paragraph 11 is clear on the proper approach:
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>5</sup>, unless:*
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>6</sup>; or*
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 6.24 Footnote 6, which identifies the areas or assets within the scope of (b)(i) above, includes both AONBs and Green Belt designations.
- 6.25 Therefore, and having regard to the comments on the Draft Local Plan, further consideration has been given to levels of growth that are less than that required to meet identified development needs. These are:
- 1) Growth reduced below the housing need level to one that does not involve any loss of Green Belt*
  - 2) Growth reduced below the housing need to one that does not involve any major development in the High Weald AONB*
- 6.26 These strategy options are elaborated upon and considered through the process of Sustainability Appraisal for the Pre-Submission Local Plan, which itself has regard to the emerging review of potential site allocations through the SHELAA.
- 6.27 Consideration of the above options can be seen alongside the ongoing liaison with neighbouring councils about their development capacity. As set out in Part C above, this includes approaches made to them about accommodating the likely levels of development that would be needed in the Green Belt and for major development in the AONB if the borough were to meet its own needs in full.
- 6.28 As well as options that meet the borough's local housing need (as discussed further below), again having regard to both the NPPF and supporting PPG in relation to potentially exceeding the standard method's housing need calculation and to Draft Local Plan comments that made a case for greater levels of development, the Sustainability Appraisal for the Pre-Submission Local Plan also assesses the following options:

10) *Growth to meet the ‘uncapped’ local housing need (c+10% above the standard method)*

11) *Growth to need the uncapped housing need plus unmet housing need from elsewhere (c+26% above the standard method)*

- 6.29 In terms of dwelling numbers, option (9) above, would provide for a little over 1,000 dwellings more than the standard method need figure, while option (10) above would provide for virtually 3,000 homes more than under the standard method.
- 6.30 There has also been further consideration of the range of options for the distribution of development. Whereas the Draft Local Plan strategy stemmed from a consideration of five options – though taking elements of different ones, these have been expanded upon and refined for the purposes of informing the further iteration in the form of the Pre-Submission Local Plan.
- 6.31 In addition to the option contained in the Draft Local Plan (Option 3 in the Sustainability Appraisal for the Pre-Submission Local Plan), the following further options have been assessed:
- Option 4 - which is similar to option 1 at Issues and Options stage and reflects the higher level of services in the existing main towns, but also acknowledges support for growth in A21 corridor (previous option 4), and includes Pembury accordingly. It does not include a new garden village, and generally, restricts change to villages.
  - Option 5 – focuses on the towns and large villages, as option 2 of the Issues and Options SA, taking account of the updated Role and Function Study 2020. While there are no strategic proposals, there is still growth at Paddock Wood as part of the overall distribution.
  - Option 6 – involves no loss of Green Belt and development is moderated in the AONB hence, without a new garden village or urban extension of Paddock Wood into the Green Belt), but growth is focused on settlements outside Green Belt.
  - Option 7 – is similar to Issues and Options option 3, in that growth is based on the relative levels of services and facilities of settlements. Also, and as sought by consultees, it provides an option that is closely aligned with the relative sustainability of settlements in terms of services and facilities, which are relatively limited in certain villages.
  - Option 8 – is similar to the previous option, being based on level of services, but moderated where settlements are in the High Weald AONB. This option also responds to consultees’ comments regarding limiting development in the AONB.
  - Option 9 - this option retains the strategic growth proposals, but reduces the level of development in villages, redistributing the balance to hamlets and other enclaves, including farmsteads, across the countryside.

- 6.32 Full details of the options, as well as their assessment in order to inform an appropriate strategy, are contained in the Sustainability Appraisal for the Pre-Submission Local Plan.

## Scale of development

- 6.33 In summary, the scale of development had a significant impact on the scores. The lower levels of development below the existing capped need (678 dwellings pa) in options 1 and 2 resulted in improvements to some environmental objectives but a deterioration in the scores some economic and social objectives. Of note, the water score did not improve when the strategic site at Paddock Wood and east Capel was removed, due to potential/proposed flood risk benefits.
- 6.34 At the higher end of the scale, levels of development that provided for uncapped need and, beyond that, also for unmet needs from elsewhere, the reverse trend was seen, with further benefits for the social and economic objectives, but large negative effects were seen for the environmental objectives.
- 6.35 The Sustainability Appraisal highlighted that it is not appropriate to conclude that positive effects cancel out negative effects, as the importance of each objective needs considering in its own right. In this respect, weight is clearly given nationally to the most highly affected environmental objectives and to meeting social and economic (development) needs. On this basis, the increasing polarisation of scores at both the lower and higher ends of the scale were seen as increasingly failing in terms of recognising the interdependence of the three strands of sustainable development. Hence, options 1 and 2, together with 10 and 11 (as well as a “no Plan” option – 12), were not favoured.
- 6.36 Growth Strategies 3 – 9 were further considered to determine how influential the distribution of development could be on enhancing the positive effects and reducing the negative effects that are observed when considering the various scales for development.

## Distribution of Development

- 6.37 Recognising the strengths of growth at larger settlements in many respects, an early finding of the Sustainability Appraisal that a greater urban intensification would be beneficial overall. This has been picked up, with a further, more in-depth examination of the potential for development on brownfield sites and within urban areas more generally. This work is reviewed at Part D below.
- 6.38 A further finding, also reflecting relationships with settlements with a greater range of services and facilities, was that there were some anomalies in the Draft Local Plan with larger amounts of development at some smaller villages, especially Hartley, Sissinghurst and Matfield. (Similarly, option 9 with more development dispersed across very rural areas resulted in several highly negative outcomes and thus was not supported.) At the same time, negative environmental effects were predicted where development was directed to certain settlements; for example, in

terms of landscape impacts associated with high growth at Cranbrook and Hawkhurst (in options 4 and 5). It was seen that these impacts could be lessened by having a strategy that was sensitive to features such as the AONB, the historic environment and/or biodiversity.

- 6.39 A particular outcome of the assessment of option 6, which looked to meet need without Green Belt release, was that this would cause highly negative impacts for travel and climate change, while some social objectives are not as positive as they would be otherwise (housing, education, equality). The advantages of including the respective strategic sites is seen from comparing other options. (See also the strategic site options below.)
- 6.40 In overall terms, the Sustainability Appraisal can be seen to support:
- a) meeting the standard method housing need figure of 678 dwellings pa
  - b) seeking to provide for more urban intensification, especially in Royal Tunbridge Wells, as the largest town
  - c) looking to have less development in the AONB, both at larger settlements of Cranbrook and Hawkhurst and at some smaller villages, subject to further consideration of site-specific merits and 'exceptional circumstances'
  - d) including strategic sites in principle over strategies without them, subject to further consideration of Green Belt impacts, respective merits and consequential 'exceptional circumstances'
- 6.41 Further consideration is given firstly to the effective use of urban land, with a focus on brownfield land (also referred to as 'previously developed land' (PDL) in the NPPF) below, while subsequent parts explore the other matters above.

## **E. Making effective use of land in built-up areas and suitable brownfield sites**

- 6.42 Ensuring optimal use of suitable PDL/brownfield site and underutilised land, particularly within the LBDs of settlements, and in the town and village centres of the Borough, has been a long-standing thrust of Tunbridge Wells Local Plan policy, as is evident through the site allocations in the Local Plan (2006) and Site Allocations Local Plan (2016).
- 6.43 This has meant that many such suitable sites have already been identified, and in many instances have or are being developed (for example, in Royal Tunbridge Wells, the former Royal Wells Hospital and Union House), or have planning permission for their redevelopment (for example, the former Arriva bus garage on the A26 and the former cinema site, also both in the town).
- 6.44 Given this previous focus, the number of remaining PDL/brownfield and underutilised sites is limited. However, their continuing potential is supported by relatively high land values.
- 6.45 Making effective use of urban land through higher densities is also a norm, not least to maximise development value. It is nonetheless reviewed, especially in highly accessible locations where higher densities may be more appropriate, subject in all cases to proper consideration of heritage and amenity factors to ensure that development is appropriate for its surrounds and context.
- 6.46 For the Draft Local Plan, the Council was mindful to ensure that suitable PDL/brownfield sites and underutilised land are put to the optimal use, particularly through the Call for Sites/SHELAA process. This included:
- reviewing all existing sites allocated in the SALP (2016) which did not have planning permission, and drawing (where relevant) on further discussions held with site promoters and developers (including at pre-application stage) to seek to increase the densities on those sites;  
  
[E.G. Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road allocated in the Site Allocations Local Plan for 30 units was increased to approximately 80 units in the Draft Local Plan (NB Following further consideration, this is now being further increased to 100 dwellings.
  - recognising sites with significant areas of hardstanding or built form, or are former waste sites, and could potentially be used much more intensively:  
  
[E.G. Land at Wyevale Garden Centre, Eridge Road, Royal Tunbridge Wells was identified as capable of accommodating an element of residential development through the Draft Local Plan. (PS This is also the case in the Pre-Submission Local Plan.) Also, brownfield land at the Benenden Hospital site in East End under was identified as capable of satisfactorily accommodating higher housing numbers. The North Farm landfill site, North



Farm Lane, Royal Tunbridge Wells was identified in the Draft Local Plan as suitable for leisure or renewable energy facilities. (NB All these sites are carried forward into the Pre-Submission Local Plan.)

- through the use of a masterplanning process, particularly where this will be led by the Council, such as at the town centre of Paddock Wood.

- 6.47 The Draft Local Plan also considered the use of a housing windfall allowance within the housing supply calculation based on the assumption that infill development, development on brownfield land, and intensification of development will continue to come forward and deliver a quantity of development that can be counted towards the housing supply. However, it took a clearly cautious approach in the calculation of this allowance, which was challenged in comments on the Draft Local Plan.
- 6.48 In response, and also in recognition of further initiatives by Government to make effective use of brownfield sites (including recent and proposed changes to permitted development rights), a comprehensive review has been undertaken to inform the Pre-Submission Local Plan. This looks at:
- historic rates of windfall developments
  - types and sizes of windfall developments
  - recent trends in windfall developments
  - likely impact of recent and emerging legislation
- 6.49 This work also reviewed whether site capacities were actually reflecting their context, including not only existing built form but the potential for higher densities, reflective of the location, to optimise the density of development.
- 6.50 The outcome of this work is set out in the 'Brownfield and Urban Land Topic Paper'. The further assessment of brownfield sites is also reflected in the updated 'SHELAA'.
- 6.51 In summary, having reviewed all the evidence, it is proposed that the Pre-Submission Local Plan includes an increased allowance (relative to that in the Draft Local Plan) for sites continuing to come forward on both small and larger windfall sites.
- 6.52 In total, over the plan period up to 2038, there is compelling evidence that such sites will provide a reliable source of supply for some 1,310 dwellings on smaller sites (of 1-9 dwellings). While known suitable, available and achievable sites of 10 or more dwellings are allocated in the Local Plan, it is also clear that there is a steady flow of sites that are not identified which also come forward, most notably some commercial and industrial sites. Therefore, it has been possible to say that a robust allowance would be for 360 dwellings on such larger, essentially urban, sites.
- 6.53 The Topic Paper also reviews the extent to which brownfield and existing urban sites were being allocated for development, and their capacities, demonstrating that suitable sites for allocation are being promoted and that their densities show effective use of land, appropriate for their location.

- 6.54 Of broader significance, it was evident that the overarching development strategy put forward in the Draft Local Plan did not make direct reference to the attention to be paid to the reuse of brownfield sites and effective use of land within existing settlements. Hence, as explained in the 'Brownfield and Urban Land Topic Paper', it is recognised that this should be explicit in policy terms. Therefore, the proposed Pre-Submission Local Plan should include:
- 1) Reference to promoting the effective use of urban and previously developed (brownfield) land (having due regard to relevant Plan policies) as part of the overall development strategy at Policy STR1
  - 2) Direct reference to the function of defined Limits to Built Development of settlements as providing the basis for focusing new development within built-up areas, also within Policy STR1;
  - 3) An additional strategic policy that focuses on the contribution of brownfield sites and urban land.
- 6.55 In relation to the latter proposal, it is particularly relevant in a borough with important heritage, landscape qualities and designations (AONB) and Green Belt that effective and efficient use of urban land and suitable brownfield sites is integral to its development strategy. It reduces pressure to develop greenfield land and, more broadly, ensures that best use is made of the higher levels of accessibility to supporting infrastructure, services and facilities within established urban areas.
- 6.56 Therefore, as an integral part of the development strategy, a new brownfield land policy is proposed. This is put forward in the 'Brownfield and Urban Land Topic Paper' and will provide an appropriate focus to support brownfield windfall developments, mostly within settlements (as defined by their Limits to Built Development), but also elsewhere where otherwise suitable in sustainability terms.

## F. Site identification and assessment

- 6.57 As set out in the preceding sub-section, the strategy for the distribution of development is firstly to make effective use of suitable PDL/brownfield sites and underutilised land, particularly within the LBDs of settlements. As well as providing for a robust windfall allowance, the focus is on identifying sites suitable for development, in line with the NPPF paragraph 67, which states:

*“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”*

- 6.58 Potential development sites have been considered as part of the preparation of a Strategic Housing and Economic Land Availability Assessment (SHELAA). The process for identifying sites is summarised below. Whether sites were within the AONB and/or Green Belt was recorded, with the assessment having due regard to the respective national policies set out in the NPPF. Further consideration of such sites is given subsequently.

### **‘Call for Sites’**

- 6.59 As well as reviewing existing allocations, two 'Call for Sites' were undertaken, firstly from February to September 2016 and a further one between May and June 2017 (running concurrently with the Issues and Options consultation). For the second Call for Sites, officers contacted the promoters of sites submitted to the first Call for Sites and identified and then contacted owners of land around settlements (on a 'without prejudice' basis) that had not been submitted through the first Call for Sites to enable them to submit sites if they wished. This proactive approach encouraged owners of land that could be suitable for development to submit sites for consideration, on a without prejudice basis.
- 6.60 The Call for Sites effectively remained open until the publication of the Draft Local Plan, although for any sites submitted after mid-February 2019 it was not possible to include them within the site assessment process that informed the Draft Local Plan (Regulation 18 consultation), as there was insufficient time to adequately assess such sites. Further sites submitted since that cut-off date were subsequently considered alongside those that were submitted as part of responses to the Regulation 18 consultation on the Draft Local Plan. Furthermore, sites submitted after the Regulation 18 consultation up to the beginning of June 2020 have also been considered.

## SHELAA process

- 6.61 In total, around 518 sites have been considered through the Pre-Submission Local Plan SHELAA process. Full details of the submitted sites, as well as those contained in previous Local Plans (which were not yet implemented) and additional sites identified by officers are set out in the 'SHELAA for the Pre-Submission Local Plan'. This report also presents information about each site, its suitability, availability, achievability, with overall conclusions on their appropriateness for allocation within the Local Plan. The conclusions have regard to the findings of the Sustainability Appraisal.
- 6.62 The assessment of each site's suitability as part of an allocation policy has included a wide-ranging analysis of desktop information using geographical information systems (GIS), site visits and consideration of the outcome and recommendations of the relevant evidence base studies that have been prepared to support the Plan.
- 6.63 Further assessments have taken account of site-specific comments made as part of responses to the Draft Local Plan. Sites have been assessed in collaboration with relevant service providers, such as officers of Kent County Council. Discussions have also been held with parish/town council/ neighbourhood plan groups (including with Royal Tunbridge Wells Town Forum): it has been useful to have local knowledge of particular characteristics of sites.
- 6.64 As part of a 'first filtering stage', sites were filtered out; the SHELAA provides a comprehensive list of the reasons why sites were filtered out at that stage.
- 6.65 Following the first filtering stage, the SHELAA undertook a detailed consideration of all remaining sites. Further information on this is provided in the SHELAA, but it is particularly relevant to note that:
- to be suitable for allocation, as well as meeting planning policy requirements, in line with the NPPF, a site also needs to be 'deliverable' and 'developable'. These tests have been applied when assessing the suitability of a site for allocation in the new Local Plan;
  - a number of sites assessed as having development potential following the stage 2 assessment process were identified as sites that may not be included in the list of sites to be considered for allocation in the new Local Plan as they are unlikely to yield 10 or more dwellings – but could therefore contribute to a “windfall” supply of housing or economic development;
  - consideration was given to whether the extent of a site as submitted has potential in its own right or whether it would be appropriate to merge the site with adjacent land; for example, to increase growth potential or address a potential constraint such as site accessibility that can only be dealt with through a wider development approach;

- the SHELAA also considered those sites which could form ‘reasonable alternatives’ to potential strategic allocations (e.g. other sites which had been submitted, and different combinations of sites combined to form strategic sites).

6.66 The outcome of the SHELAA process has been to:

- identify sites across the borough that are suitable for further consideration for allocation for development through the local plan process
- draw out some more sites suitable for allocation within existing built-up areas, notably at Royal Tunbridge Wells
- have maximised the development potential of the areas outside the AONB and Green Belt, and represent proportionately more development than has been previously delivered
- identify a number of suitable sites around the eastern and northern sides of Paddock Wood and at Horsmonden, and (to a lesser extent) at Sissinghurst, East End (Benenden) and Frittenden, all of which are outside both the AONB and Green Belt designations
- show that even with a relatively widespread housing growth, the total amount of land suitable for housing and economic development will fall well short of meeting the identified needs without some ‘strategic growth’.

## G. Consideration of a new settlement and/or urban extension

6.67 Paragraph 72 of the NPPF recognises that:

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”*

6.68 This paragraph also sets out the key considerations when planning for such development.

6.69 As highlighted above in Part D above, the Sustainability Appraisal advises that new settlement growth can be a sustainable element to the strategy. However, suitable opportunities are extremely limited.

6.70 The following figure, taken from the Sustainability Appraisal for the Pre-Submission Local Plan, shows the sites (or individual sites which could be made into parcels), of a scale where consideration was given as to whether they could comprise a new settlement or significant extension to existing settlements.

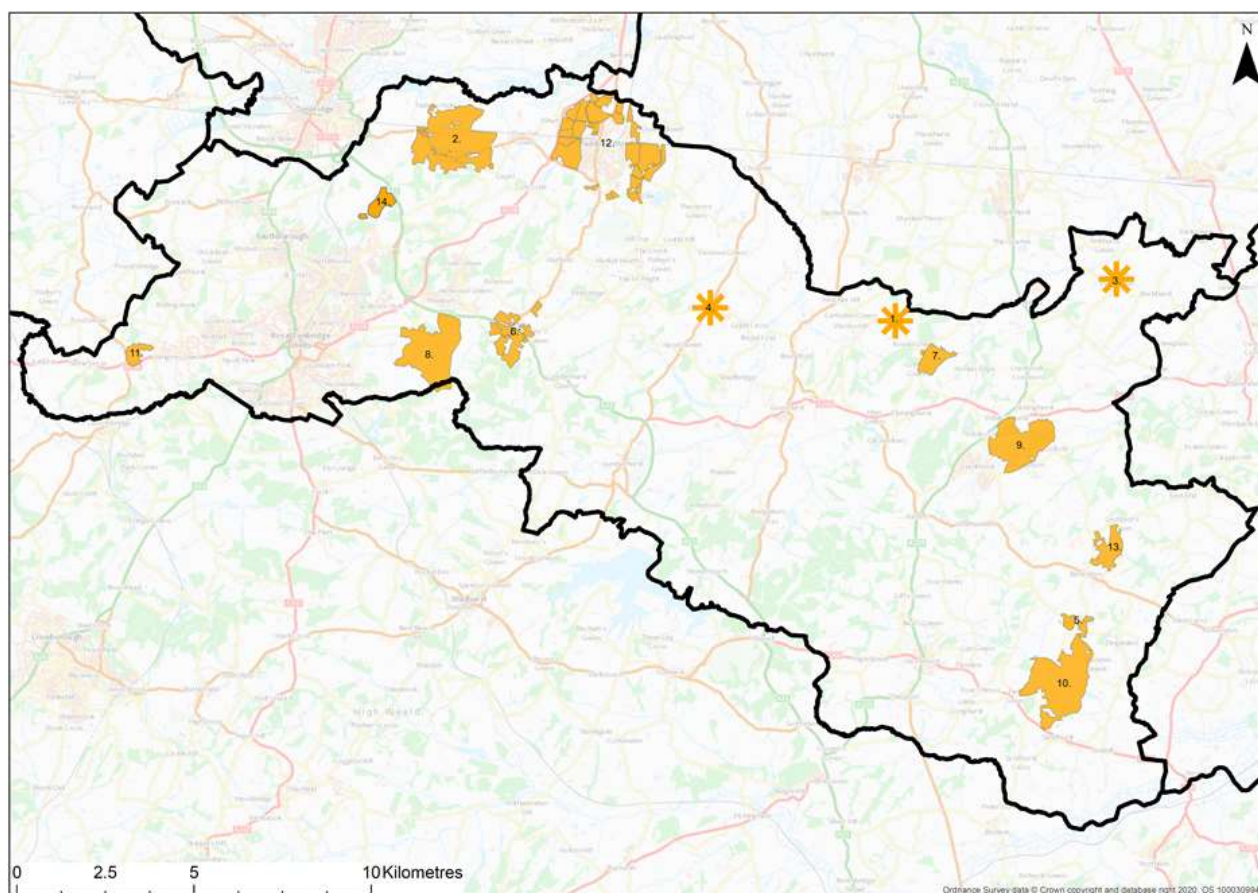


Figure 6: Map of garden settlement options within the borough

- 6.71 The largest site, or rather combination of sites that are beyond the AONB and the Green Belt are those around Paddock Wood, albeit those to the west encroach into the Green Belt. These are considered further below.
- 6.72 Elsewhere, beyond the AONB and Green Belt designations, there were sites submitted in the Call for Sites as well as other areas which were considered as worthy of investigation for a new settlement. These included areas based on the existing villages of Frittenden and Horsmonden. Although actual sites were not submitted in the 'Call for Sites', and therefore could have been considered as unavailable (and indeed not achievable), it was considered appropriate to assess these under the Sustainability Appraisal as they are established villages. Another area, being based on Blantyre House, a former prison in a relative remote location to the north east of Goudhurst, was submitted, as was a large site adjacent to Colliers Green Primary School, Colliers Green, a small hamlet lying well to the north-west of Cranbrook. The Sustainability Appraisal identifies all the new settlement options that were appraised, the findings of which input to the respective site assessments in the Strategic Housing and Economic Land Availability Assessment (SHELAA).
- 6.73 In essence, the only option that would reasonably be capable of delivering a substantial and sustainable strategic growth location outside the AONB and Green Belt would be around parts of Paddock Wood.
- 6.74 Frittenden does not offer a sustainable, or potentially sustainable option. It has considerable issues related to relative remoteness and accessibility. The local highway network wholly comprises rural lanes, access to jobs and higher order services is poor. The character of the wider locality is very rural; also, there is a very piecemeal land ownership; indeed, no large sites were submitted.
- 6.75 While Horsmonden is outside the AONB, it is very close to its northern edge – being only 100m beyond on its western side; moreover, its surrounds have many High Weald landscape characteristics. Also, it is not well related to the urban centres. Paddock Wood, nearly 5 miles to the west, is the closest town, but is accessed by rural lanes. The combination of rural character, heritage constraints, unsuitable highway infrastructure and relatively poor access to high level services and employment, together with land ownership factors, mean that it is unsuitable to deliver a Garden Village development.
- 6.76 Both Blantyre House and land at Colliers Green are too remote locations to form a basis of such growth. The former is acknowledged as being a partly brownfield site, but this does not outweigh the objections, while its availability for redevelopment has recently been withdrawn by the owners.
- 6.77 There are a number of submitted sites within the High Weald AONB. As set out in Section 6H of this Topic Paper, national policy regarding major development in the AONB is clear: the tests to be met for major development are extremely high, and include demonstrating that (housing and employment) needs cannot be met in



some other way (which will include being either elsewhere in the Borough, or outside, under the Duty to Co-operate).

- 6.78 Nationally, development of a new settlement or significant extension to an existing village or and town of such a scale as to meet the requirement under para 172 b) of the NPPF (i.e. that the size of the proposal will support a sustainable community, with sufficient access to services and employment opportunities within the development itself, or in larger towns to which there is good access) in the AONB is unprecedented. Furthermore, the character and essential qualities of the High Weald are especially sensitive to such large-scale development.
- 6.79 Therefore, and also having assessed the impact on the landscape and scenic beauty that would arise from the development of the specific sites, none of the submitted potential strategic sites, or parts of sites, which are located in the AONB is found to be a reasonable option. Hence, while assessing both through the SHELAA and the Sustainability Appraisal process, they have been discounted at a fairly early stage.
- 6.80 There were also submitted sites that lie within the current Green Belt, in whole or part (but outside the AONB). These are:
- a) Paddock Wood (as noted above)
  - b) Land at Tudeley, between Paddock Wood and Tonbridge

### **Land at Paddock Wood (including land in east Capel) and at Tudeley**

- 6.81 The further assessment of the suitability of Paddock Wood for significant, indeed transformational, expansion and for a new settlement at Tudeley has had regard to the guidelines in paragraph 72 of the NPPF. Please see Appendix 6 for an assessment of these strategic sites against the requirement of this paragraph.
- 6.82 In summary, the opportunities presented by existing and planned infrastructure investment, as well as economic potential and the scope for net environmental gains, as set out in consideration (a) of paragraph 72 are all very relevant to both locations:
- a) Both locations relate to the A228, where improvements are planned, while it is also likely that further transport investment would support growth in both areas.
  - b) Paddock Wood is an established employment centre with growth potential, while Tudeley would be well located in relation to both it and Tonbridge, a few miles to the west.
  - c) Green Belt impacts in both cases need careful scrutiny, not least as Tudeley would be wholly within the Green Belt and could impact on the setting of the High Weald AONB, while the growth of Paddock Wood could also encroach into the Green Belt and, potentially, impact on the setting of the AONB to the south.

- d) Flood risk is a further issue, as it is recognised that land to the west of Paddock Wood, in Capel parish, has flooding constraints which would need to be properly considered.

6.83 In terms of consideration (b), relating to size and location, it is recognised that scale is important for the functionality and sustainability of a new settlement, to be sufficient to support everyday services, such as shops, education and healthcare provision. The provision of such services will influence quality of place, level of containment and ultimately households' decisions to live in a new settlement as these will be fundamental to delivering it. Paddock Wood is an established town with a broad range of existing services and facilities (see Role and Function Study, 2021). A substantial level of growth could support and provide an opportunity to enhance this provision.

6.84 There are options for the direction and scale of growth at Paddock Wood and for Tudeley, with those for the latter all being at least of a scale that would support a good range of facilities and services. These are presented, respectively, below.

### **Strategic growth options for Paddock Wood**

6.85 Five basic options for the scale and direction of strategic growth of Paddock Wood have been assessed. These are shown diagrammatically in the Sustainability Appraisal for the Pre-Submission Local Plan. It includes options for development in different directions around the town to varying degrees, including excluding land in the Green Belt (mainly in Capel parish).

6.86 It is noted that the options have been decreased by 500 dwellings across all options since the Draft Local Plan stage to reflect the findings of the master-planning process that has since been undertaken.

- Option 1 was for the development of approximately 1,500 new dwellings (plus the 1,000 dwellings from the existing SALP sites) without any land take within the Green Belt. Growth here is limited by the borough boundary and the extensive areas of flood zone 3.
- Option 2 was for development of approximately 3,500 (plus the 1,000 dwellings from the existing SALP sites) dwellings following the same pattern as Option 1 with an additional extension of development westwards into the Capel parish Green Belt and allowing for flood relief work to the town.
- Option 3 was for approximately 2,500 dwellings (plus the 1,000 dwellings from the existing SALP sites) following the same pattern as Option 1 but extending southwards instead of westwards into land that is not ruled out by constraints such as AONB, Green Belt, flood risk and ancient woodland.
- Option 4 was for approximately 4,500 dwellings (plus the 1,000 dwellings from the existing SALP sites) following the same pattern as Option 1 but extending both westwards and southwards more than doubling the size of Paddock Wood.

- Option 5 was for approximately 2,500 dwellings (plus the 1,000 dwellings from the existing SALP sites) following the same pattern as Option 1 but extending eastwards instead of westwards into land that is not ruled out by constraints such as AONB, Green Belt, flood risk and ancient woodland.

- 6.87 No further larger options were assessed as it was felt that anything larger would be too distant from the town centre to be sustainable and unlikely to be delivered in the plan period.
- 6.88 In summary, notwithstanding the Green Belt designation of land to the west, the option involving development all around the town is favoured in overall sustainability terms. This largely reflects the combination of facilitating business growth, general accessibility to central facilities, together with the flood betterment possible for the town.
- 6.89 The Sustainability Appraisal recognises that further consideration needs to be given to related transport infrastructure to serve growth. Again, this was done at a high level through the Sustainability Appraisal and through more detailed work by masterplanning, taking account of the potential for additional strategic growth in the form of a new garden village at Tudeley, as identified below.
- 6.90 Once the most sustainable option for this strategic extension to Paddock Wood, to include land in east Capel, had been identified, work was commissioned to comprehensively masterplan the expanded settlement in August 2020. It was made clear at the outset that the growth around Paddock Wood and east Capel, (and Tudeley Village), could only be included in the Local Plan if both were comprehensively masterplanned, as new strategic settlements, to ensure a holistic approach to development. It was also a requirement that both settlements were delivered on garden settlement principles.
- 6.91 David Lock Associates (DLA), a nationally renowned masterplanning practice, was appointed to undertake this work. DLA is supported by Stantec, JBA and SQW.
- 6.92 The purpose of the masterplanning work is twofold. The first element is the provision of a Structure Plan for Paddock Wood and east Capel. The Structure Plan seeks to identify through a comprehensive masterplanning exercise, the capacity of the new settlement around Paddock Wood and east Capel, in terms of the number of dwellings, level of non-residential floorspace, and the location and provision of key infrastructure within the settlement.
- 6.93 Within the DLA team noted above, Stantec led on highways and utilities matters, while JBA led on flood matters. Stantec has produced an Access and Movement report, setting out the highway infrastructure requirements to mitigate the growth for both strategic sites. This has been developed in conjunction with PJA which has completed a Local Cycle, Walking and Infrastructure Plan for the Council; and SWECO who has carried out the Transport Assessment modelling for the Local Plan as a whole. The transport matters have been fully considered in terms of the growth at Paddock Wood and east Capel, and at Tudeley Village which is located 2

miles to the west, and the impact of both settlements upon the highway network in this location and more widely.

- 6.94 JBA has undertaken additional modelling on flood risk matters to inform this strategic site work. JBA prepared the Council's Level 1 and 2 Strategic Flood Risk Assessment to inform the Local Plan and so are well placed to prepare this additional modelling.
- 6.95 Through the comprehensive masterplanning work undertaken by DLA, there is an appropriate and well considered Structure Plan for the growth around Paddock Wood and east Capel. This provides for a sustainable expanded settlement around Paddock Wood of 3,490-3,590 new dwellings, along with the associated infrastructure, with solutions identified to ensure the integration of the settlement into the existing community at Paddock Wood. The existing flood constraints are well understood, and appropriate solutions incorporated into the masterplanning work. This will ensure the whole settlement benefits from being transformed into a garden settlement.
- 6.96 The second element is the delivery of a Strategic Site Infrastructure Framework to identify the infrastructure capacity requirements stemming from both the Strategic Sites: Paddock Wood and east Capel; and Tudeley Village. This element provides advice on the deliverability of the growth planned, with specific regard to the different parcels being promoted, and the different options including terms of equalisation or similar between two or more parties. Infrastructure delivery focuses not only on the infrastructure required to mitigate the impacts on existing areas of development, but also the infrastructure that is required to ensure the new development meets the Plan's policy objectives and the garden settlement principles.
- 6.97 Further details of the development of the approach to the strategic growth of Paddock Wood (extending into east Capel) is set out in the 'Strategic Sites Topic Paper'.

### **Strategic growth options for land at Tudeley**

- 6.98 Further to the consideration of two options for a new village at Tudeley at the Draft Local Plan stage, following consultation responses, an additional, smaller option for the development is considered appropriate to assess, still in line with the minimum advocated size of a garden settlement. Hence, the options involve distinctly different scales of development, all centred on Tudeley. These are:
1. approximately 1,500 dwellings to south of the railway line
  2. approximately 2,800 dwellings, straddling the railway line
  3. approximately 5,000 dwellings, following the same pattern as but extending southwards where land is not constrained by Flood Zone 3, but is in the AONB and Green Belt.

- 6.99 A further option of 1,500 dwellings north of the railway line was not considered because it was felt unlikely to be viable from an accessibility standpoint.
- 6.100 In summary, the Sustainability Appraisal finds that increasing benefits arise, to a degree, from larger scales of growth, although this may place some residents beyond desirable walking distances to the more central facilities. Most (but not all) scores against environmental objectives are negative. They are generally more pronounced for Option 3. While the smaller option would have somewhat less environmental impacts overall, a somewhat larger scale would provide for greater self-containment and provide more scope for environmental enhancements, including for improvements in flood risk elsewhere through offsite measures. Also, assuming that there is a clear need for the development, there are more positive economic and social impacts with Option 2 over Option 1.
- 6.101 The land which forms part of the proposed Tudeley Village garden settlement allocation is under the single ownership of the Hadlow Estate. The Hadlow Estate commissioned its own masterplanning work, as detailed in the Tudeley Village Delivery Strategy. This exercise was led by Turnberry Consulting with input from a consultant team including CPZ CoDesign, Brook Murray Architects, EnPlan, Applied Ecology, Andrew Cameron & Associates, Orion Heritage and WSP. The Delivery Strategy sets out the comprehensive approach taken to masterplanning Tudeley Village, along with detailed aspirations for the new settlement and how these can be realised and safeguarded in perpetuity. Information is provided on how the settlement will be delivered on the ground, along with details of phasing.
- 6.102 The total size of the proposed Tudeley Village as assessed through SA Option 2 is 170 ha. The site capacity assessment undertaken through the comprehensive masterplanning work has identified a developable area of 95 ha. This developable area includes space for housing and associated uses (access road, private gardens, car parking, incidental open space and children's play areas). Some 2,800 dwellings are proposed to be delivered, applying an average density of just under 30 dph. A mix of dwelling sizes are considered, including 1-bed to 5-bed units. This in addition to a range of complementary uses to support a garden settlement of this size including retail, commercial, community, sport and education uses. Importantly, sustainable linkages are fully considered and integrated throughout. Further, the masterplanning work shows a good understanding of the impact of the proposed settlement on the remaining Green Belt and provides sensible and achievable options for delivering compensatory improvements to the remaining Green Belt in this location. It also provides information on opportunities for betterment to flooding to Five Oak Green,
- 6.103 As summarised above, the assessment of the requisite infrastructure was led by the DLA team appointed by TWBC to ensure an impartial, complete and robust assessment was made. This identifies a complete and fully costed schedule of infrastructure required not only to mitigate the impacts of development, but to also ensure the new development meets TWBC's policy objectives and the garden settlement principles.

- 6.104 Further details of the development of the approach to the establishment of a new garden settlement at Tudeley Village is set out in the 'Strategic Sites Topic Paper'.

### **Transport improvements for strategic growth**

- 6.105 In order to successfully deliver the strategic sites, highways and infrastructure improvements to the transport network are found to be required. The options considered are:
- The A228 between B2017 and Maidstone Road Pembury junctions
  - Links from Tudeley Village east to the A228
  - Links from Tudeley Village west to Tonbridge
  - Links from Paddock Wood and east Capel Urban Extension west onto the adjacent A228
- 6.106 Drawing on transport assessment studies, the masterplanning work supports an option which provides for both on and offline improvements to the A228 (offline around the junction at Colts Hill) and an additional offline link to the south of Five Oak Green from the A228 to join the B2017 east of Tonbridge. Again, further details are set out in the Strategic Sites Topic Paper.

## H. Development in the High Weald AONB

- 6.107 This section explains how the Council has assessed development potential within the High Weald Area of Outstanding Natural Beauty (AONB) to contribute to meeting identified housing and economic development needs.
- 6.108 The High Weald AONB covers some 69% of the borough. It not only applies to the countryside but ‘washes over’ many settlements, including Hawkhurst and Cranbrook. It also wraps around the main urban area of Royal Tunbridge Wells and Southborough.
- 6.109 Given this high coverage of the borough, and that AONBs are nationally important landscapes, it follows that particularly careful attention should be given to ensuring that development provisions in the Local Plan have the necessary regard to relevant legislative and national policy requirements, as well as to impacts on the local landscape character, in relation to the High Weald AONB.
- 6.110 The section provides some further context and sets out how the Council has approached development in the High Weald AONB through the process of preparing the Pre-Submission Local Plan under the following headings:
- National policy and guidance
  - The High Weald AONB and AONB Management Plan
  - Overall approach
  - Determining whether developments are ‘major’
  - Consideration of ‘exceptional circumstances’
  - Summary and conclusion
- 6.111 Following the two initial sub-sections which provide contextual information about the AONB and the relevant legislation and national planning policies, the Council’s approach to the consideration of the amount of development in the AONB and within its setting is set out.
- 6.112 The approach to the issue of ‘major’ development in the AONB is then set out, reviewing all proposed developments in the AONB to determine whether their development should properly be regarded as ‘major’ (in AONB terms). This takes account of a number of factors, which are set out in a methodology statement.
- 6.113 Those ‘major’ developments are then examined, along with the wider context, to determine whether there are ‘exceptional circumstances’ that would justify their allocation in the Local Plan. The final sub-section provides a concluding overview of the findings.



- 6.114 Of note, for all developments in an AONB, irrespective of size, the approach gives ‘great weight’ to conserving and enhancing its landscape and scenic beauty, which is at the heart of national policy, as shown below.

## National Policy and Guidance

- 6.115 The legislative basis for the consideration of AONBs is set out in the Countryside and Rights of Way (CROW) Act 2000. Section 85 (1) states:

*“(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”*

- 6.116 General guidance for Local Planning authorities and others on meeting this duty is provided in publications from Defra in 2005<sup>1</sup> and Natural England in 2010<sup>2</sup>. The Defra guidance makes it clear that despite the “highest status of protection” that applies to AONBs that the duty has its limitations (Defra para 8):

*“It is important for all to be aware that the duties do not override particular obligations or considerations which have to be taken into account by relevant authorities in carrying out any function. However, they are intended to ensure that the purposes for which these areas have been designated are recognised as an essential consideration in reaching decisions or undertaking activities that impact on those areas”.*

- 6.117 In applying the duty, Defra has the following expectations:

*“Relevant authorities are expected to be able to demonstrate that they have fulfilled these duties. Where their decisions may affect National Parks, AONBs or the Broads, they should be able to clearly show how they have considered the purposes of these areas in their decision making. This might be done in the following ways:*

- relevant authorities should consider undertaking and making publicly available an assessment of the impact on National Parks, the Broads or AONBs of any policy, plan, programme or project which is likely to affect land within these areas.*
- relevant authorities should ensure that decisions affecting these areas are properly considered and recorded.”*

- 6.118 In terms of what “*have regard to*” means in practice the Natural England Guidance advises:

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<sup>1</sup> Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads DEFRA Guidance note 2005

<sup>2</sup> England’s statutory landscape designations: a practical guide to your duty of regard – Natural England 2010

- *“Decisions and actions taken by relevant authorities will invariably require a wide range of factors and issues to be taken into account.*
- *The duty requires that this process should include consideration of potential impacts on AONB/National Park purposes – with the expectation that adverse impacts will be avoided or mitigated where possible.*
- *Provided this is done, the duty has been met, irrespective of whether or not the decision ultimately taken conflicts with AONB/National Park purposes”.*

6.119 Paragraph 172 of the National Planning Policy Framework (NPPF) also sets out the Government’s policy on how this statutory duty to have regard to AONBs should be met through the planning system. It states:

*“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads<sup>54</sup>. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development<sup>55</sup> other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

6.120 Footnote 55 directly relates to the definition of ‘major’ development for the purposes of the assessment. It states:

*“For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”*

6.121 The general approach to the distribution of development in the NPPF, as highlighted in the previous NPPF paragraph, 171, is that local planning authorities should favour allocating land *“with the least environmental or amenity value, where consistent with other policies in this Framework”.*

6.122 There is also advice contained in the Planning Practice Guidance. Of particular note:

- In relation to plan-making, paragraph ID: 61-043-20190315 states that: *“All planning policies and decisions need to be based on up-to date information about the natural environment and other characteristics of the area including drawing, for example, from ... Areas of Outstanding Natural Beauty Management Plans ...”*
- Paragraph ID: 8-040-20190721 elaborates, noting that AONB Management Plans *“... may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications.”*
- Paragraph ID: 8-039-20190721 clarifies that the duty to have regard to the purposes for which AONBs are designated is relevant in considering development proposals that are situated outside AONB boundaries, but which might have an impact on their setting or protection. Some elaboration is provided by Paragraph ID: 8-042-20190721.
- Paragraph ID: 8-041-20190721 relates directly to ‘How should development within National Parks, the Broads and Areas of Outstanding Natural Beauty be approached?’ It states:

*“The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated.*

*All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality. Where applications for major development come forward, paragraph 172 of the Framework sets out a number of particular considerations that should apply when deciding whether permission should be granted.”*

### **Proposed NPPF changes**

- 6.123 A Government consultation on proposed changes to the NPPF was issued on the 8 February 2021: “National Planning Policy Framework and National Model Design Code: consultation proposals”. This contained a proposed change to existing paragraph 172 of the NPPF splitting it into two parts: the first dealing with “great weight” (with an added sentence on the importance of the setting of AONBs) and

the second dealing with 'major' development. The second paragraph (176) is proposed to be changed as follows:

*“176. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should.....”*

6.124 The consultation document explains the purpose of this change as follows:

*“New paragraph 176 has been separated from the preceding paragraph to clarify that this policy applies at the development management stage only”.*

6.125 Whilst this change suggests that there is no need to apply the 'major' development test during Plan Making, the interpretation of the existing NPPF paragraph 172 by the Council to apply the 'major' test to development proposed within the Local Plan at Regulation 18 was supported by Natural England. Whilst there may have been some doubt over the application of this part of paragraph 172 to Development Plans applying the 'major' development test was viewed by the Council as a precautionary approach and one important to ensuring delivery of sites that would in any event face the test at application stage. As the matter is still being consulted on the Council has continued with that approach in this Topic Paper.

## **The High Weald AONB and AONB Management Plan**

6.126 The High Weald was designated as an AONB in 1983. It is an historic landscape formed from a deeply incised, ridged and faulted landform of clays and sandstone, with numerous gill streams. It is highly wooded, framing a still largely medieval pattern of small, irregular fields, typically used for grazing. The historic settlement pattern is one of scattered farmsteads and late medieval villages.

6.127 It is the fourth largest AONB in the country, with an area of 1,461 sq. km, spanning eleven Districts and four Counties. Some 16% of the AONB falls within Tunbridge Wells borough. Its local extent can be seen on Figure 2 in the Environmental Designations section above.

6.128 The High Weald AONB Management Plan which guides the shared approach to its conservation and enhancement has recently been reviewed, resulting in approval of the current Management Plan 2019-2024 and this is explored in more detail below.

## **Overall approach**

6.129 Overall, the Council has paid full regard to both the NPPF, PPG and guidance from Defra.

6.130 In order that 'great weight is given to conserving and enhancing landscape and scenic beauty', it is necessary to appreciate the defining characteristics that make

the High Weald AONB nationally important. These are set out in the ‘Statement of Significance’ in the High Weald AONB Management Plan 2019-2024. It states:

***“The natural beauty of the High Weald comprises***

- ***Five defining components of character*** that have made the High Weald a recognisably distinct and homogenous area for at least the last 700 years.
  1. ***Geology, landform and water systems*** – a deeply incised, ridged and faulted landform of clays and sandstone with numerous gill streams.
  2. ***Settlement*** – dispersed historic settlement including high densities of isolated farmsteads and late Medieval villages founded on trade and non-agricultural rural industries.
  3. ***Routeways*** – a dense network of historic routeways (now roads, tracks and paths).
  4. ***Woodland*** – abundance of ancient woodland, highly interconnected and in smallholdings.
  5. ***Field and Heath*** – small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths, and inned river valleys.
- ***Land-based economy and related rural life*** bound up with, and underpinning, the observable character of the landscape with roots extending deep into history. An increasingly broad-based economy but with a significant land-based sector and related community life focused on mixed farming (particularly family farms and smallholdings), woodland management and rural crafts.
- ***Other qualities*** and features that are connected to the interaction between the landscape and people and which enrich character components. Such qualities and features enhance health and wellbeing, and foster enjoyment and appreciation of the beauty of nature. These include locally distinctive features which enrich the character components such as historic parks and gardens, orchards, hop gardens, veteran trees, along with their rich and varied biodiversity, and a wide range of appealing and locally distinctive historic buildings including oast houses, farm buildings, Wealden Hall houses and their associated features such as clay-tile catslide roofs. People value the wonderful views and scenic beauty of the High Weald with its relative tranquillity. They appreciate the area’s ancientness and sense of history, its intrinsically dark landscape with the opportunity to see our own galaxy – the Milky Way – and the ability to get close to nature through the myriad public rights of way.”

6.131 The High Weald Unit (the Executive of the Joint Advisory Committee) has provided a series of GIS layers which relate to these defining character components:

- Water systems data (watercourses, ponds, reservoirs and openwater)
- Geology data (bedrock geology and sandstone outcrops)
- Settlement data (historic settlement pattern and historic farmsteads)

- Historic routeways data
- Woodland data (ancient semi-natural woodlands and ancient woodland sites)
- Field and heath data (historic field boundaries, heathland, wildflower grassland)

6.132 These layers, coupled with site visits by planning officers, have been used to assess submitted sites and to help understand the likely landscape and other environmental effects of the development on the AONB. The Borough Council supplements these in its assessment framework with the following sources of information, calling on support from specialist landscape, biodiversity and heritage officers as necessary:

- Public Rights of Way (KCC)
- Borough-wide Historic Landscape Characterisation Study (TWBC and HWU)
- Historical Ordnance Survey mapping (TWBC GIS)
- Aerial photography - recent and historical (TWBC GIS)
- Designated heritage sites such as Historic Parks and Gardens, listed buildings, conservation areas, areas of archaeological potential etc. (TWBC GIS)
- The Historic Environment Record (KCC)
- Borough Landscape Character Assessment (TWBC)
- Landscape Sensitivity Studies – where available (TWBC)
- Kent Habitat Survey 2012 (KCC)
- Designated wildlife sites (Natural England, KCC, KWT and TWBC)
- Provisional Inventory for Ancient Woodland (TWBC, Natural England)
- Priority habitats and species records (Kent and Medway Biological Records Centre)

6.133 In addition, following comments received in response to draft proposals at the Regulation 18 stage, to the effect that the number and scale of developments both overall and in some cases individually, did not represent ‘limited development’ in the AONB, did they meet the tests for major development, a more rigorous appraisal of the larger sites considered was accepted as being warranted.

6.134 For all of the 17 draft site allocations that were considered to be ‘major’ (in AONB terms) for major developments, a Landscape and Visual Impact Assessment (LVIA) was commissioned to reassess their suitability for development and to consider further measures for avoidance and mitigation of possible adverse effects as well as to consider what further benefits they might provide. Natural England and the AONB Unit were consulted on the methodology for the LVIA as the work progressed so that comments could be taken into account before reaching any final conclusions.

- 6.135 In addition, the Council is mindful of the possibility of effects on the AONB arising from development within the setting. The Borough Landscape Character Assessment 2017 notes that the High Weald National Character Area extends further north than the designated High Weald AONB and shares similar characteristics. The Landscape Character Assessment has been taken into account as part of the site assessment process.
- 6.136 Furthermore, the Council has undertaken a detailed study of the development proposed within the setting of the AONB (AONB Setting Analysis Report, HDA November 2020). This has informed policy and proposals for sites within the setting of the AONB and ensures that harm is avoided or at least satisfactorily mitigated. Again, Natural England and the AONB Unit were consulted on the study.
- 6.137 Concerns were also raised about the loss of grassland habitats as a result of development within the AONB. In response, the Council commissioned an independent survey of all proposed sites to be allocated within the AONB that contained pasture/grassland. (The 'Grassland Survey' found no special or priority grassland habitats. It did find one site contained another type of priority habitat, as a consequence of which that site is not proposed to be retained for allocation.)
- 6.138 The LVIA's, the Settings Analysis and other studies have all informed site assessments of the suitability of sites through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process – see 'SHELAA' document.
- 6.139 It is believed that the further work subsequent to the Draft Local Plan, as well as a consideration of the comments received at that stage, enables the Council to better ensure that it has proper regard to the AONB, and to demonstrate this.
- 6.140 At the same time, it cannot be guaranteed that adverse impacts to AONB interests will always be avoided. Indeed, as noted by the Defra and Natural England guidance on the duty, planning judgements, in line with national policy, require a range of considerations to be balanced. This includes consideration of the benefits that the development of sites might offer such as local housing, community facilities, infrastructure, open space and landscape improvements. However, in this balancing exercise, national policy also makes clear the 'great weight' to conserving and enhancing AONBs.
- 6.141 In terms of giving great weight to the AONB's defining characteristics, the approach taken is that where development is considered likely to cause significant harm to the defining character of the AONB (also having regard to potential mitigation) or cause harm disproportionate to likely benefits of the scheme, then that development will be very unlikely to be supported. This approach is applied irrespective of the size of the proposed development.
- 6.142 The results of that work and the consequent reassessment of the consultative draft site allocations, including in relation to the exceptional circumstances for major developments where applicable, are set out below and in the related appendices.



## Determining whether developments are ‘major’

- 6.143 Although the wording of paragraph 172 of the NPPF, as reproduced above, only refers to the consideration of ‘major’ developments in terms of planning applications, it has been considered appropriate for the approach to Local Plan allocations to be consistent with that of determining planning applications. This approach has been supported by Natural England (see comment above on Proposed Changes to the NPPF).
- 6.144 The NPPF advises (footnote 55) that:
- ‘ whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.’.*
- 6.145 In order to assist the decision making the Council has employed a matrix based on the criteria of NPPF footnote 55 taking into account:
- Nature of development
  - Scale
  - Setting
  - Potential for Significant adverse impact on AONB purposes
- 6.146 The methodology used for assessing whether developments are major in AONB terms is set out in Appendix 2. This has been slightly revised from that used at the earlier stage, taking note of the comments received at Regulation 18. It is stressed that none of the factors are considered in isolation or in a prescriptive way but inform a rounded assessment of whether a proposed development is ‘major’.
- 6.147 The results of the respective assessments against each of the above NPPF considerations are drawn together by experienced planning officers in making a judgement on whether a development is ‘major’ or not. While this is a matter of planning judgement, it is based on experience in the local context, using the above assessment framework to ensure a consistent approach. It has been informed by comments from Natural England and the AONB Unit through an ongoing dialogue, as well as relevant recent appeal decisions.
- 6.148 At Regulation 18, there was broad agreement with Natural England on the list of sites considered to be ‘major’ and not ‘major’ but some decisions were challenged by the AONB Unit, which suggested that further sites might be considered major. All proposed allocations in the AONB have accordingly been reassessed in terms of ‘major’/not ‘major’. Assessment sheets for each of the proposed allocations in the AONB are provided as Appendix 3.
- 6.149 Sites considered to be major are set out in Table 2 below. They are identified by their (anticipated) Pre-Submission Local Plan (PSLP) policy number (with reference

back to the Draft Local Plan (DLP) policy number, where applicable, in brackets), as well as by address.

Table 2: Proposed allocations that are considered to be 'major'

<b>SITE POLICY REFERENCE</b>	<b>SITE ADDRESS</b>	<b>DEVELOPMENT PROPOSED</b>
<b>Royal Tunbridge Wells</b>		
<b>RTW 16</b> (DLP: RTW 18)	Land to the west of Eridge Road at Spratsbrook Farm	Housing (120 units)
<b>RTW 17</b> (DLP: RTW 12)	Land adjacent to Longfield Road	Employment (80,000sqm)
<b>Cranbrook and Sissinghurst</b>		
<b>CRS 1*</b> (DLP: Part of CRS 9)	Brick Kiln Farm	Housing (180 units)
<b>CRS 2***</b> (DLP: Part of CRS 9)	Land South of Corn Hall	Housing (35-45 dwellings)
<b>CRS 3</b> (DLP: CRS 4)	Turnden Farm, Hartley Road	Housing (164-168 additional units)
<b>Hawkhurst</b>		
<b>HA 1**</b> (new site)	The White House	Housing (43 retirement units)
<b>HA 4</b> (DLP: HA 6)	Land at Copthall Avenue and Highgate Hill	Housing (70-79 units)
<b>Brenchley and Matfield</b>		
<b>BM 1 –</b> (DLP: BM 1?)	Land between Brenchley Road, Coppers Lane, and Maidstone Road	Housing (45 units)
<b>Pembury</b>		
<b>PE 1*** –</b> (DLP: PE 1)	Land to the rear of High Street and west of Chalket Lane	Housing (50-60 units)
<b>PE 2*** –</b> (DLP: PE 1)	Land at Hubbles Farm and south of Hastings	Housing (80 units)

SITE POLICY REFERENCE	SITE ADDRESS	DEVELOPMENT PROPOSED
	Road	
PE 3*** – (DLP: PE 3)	Land north of the A21, south and west of Hastings Road	Housing (80 units)

\* Site previously included in Site Allocations Local Plan 2016

\*\* Consented at appeal

\*\*\* Sites CRS 2 and sites PE 1 - PE 3 are regarded as 'major' on a cumulative basis

## Consideration of 'exceptional circumstances'

- 6.150 As highlighted under 'National Policy and Guidance' above, in line with NPPF paragraph 172, development in AONB should be limited in both scale and extent. For plan-making, this is taken to mean both in overall terms and in relation to individual proposals.
- 6.151 In addition to the great weight attached to the conservation and enhancement of the AONB for all development proposed in the AONB. the approach to paragraph 172, as explained above, is that major development proposals should only be included in the Local Plan if it can be concluded that there are exceptional circumstances to override the presumption against such developments.
- 6.152 To recap, this paragraph states:
- "Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
  - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
  - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."*
- 6.153 These tests, or rather, considerations, are taken to require the Council to not only find that there are exceptional circumstances that justify a proposal, but also to find that it would be 'in the public interest'.
- 6.154 Also, while the three bullet points are broad ranging, it is noted that they do not exclude other considerations. Indeed, particularly in the local context, it is considered that, rather than just having regard to the degree of any detrimental effect, this can be broadened to also have regard to the opportunities provided for

enhancement, which may relate to heritage assets, community facilities, ecology and green infrastructure, as well as directly to landscape character.

6.155 In terms of defining exceptional circumstances and public interest, the particular circumstances of the individual proposals are critical. At the same time, a wider perspective is taken, notably in relation to the need for the development.

6.156 Therefore, the justification for those major allocations that are being proposed for inclusion in the Pre-Submission Local Plan is split into two components; the first relates to factors that are local to Tunbridge Wells borough – which are set out in Table 3 below - and the second, to the details of individual proposals.

Table 3: Factors local to Tunbridge Wells borough and to individual proposals

NPPF Test	Assessment
The need for development and economic implications	<p>As identified in Section 4 and elaborated upon in the ‘Housing Needs Assessment Topic Paper’, there is a substantial local housing need, which it has been found cannot, sustainably, be met without at least some major development in the AONB, which covers nearly 70% of the borough.</p> <p>The delivery of housing to meet housing need is clearly in the public interest and, together with insufficient opportunities elsewhere, is regarded as an important factor in providing exceptional circumstances to justify some major residential development in the AONB.</p> <p>Furthermore, there is a very high affordability ratio in the borough that is limiting access of local people to housing.</p> <p>Boosting overall supply, including through provision of a significant proportion of affordable homes for local people, will improve access to housing. The high need for affordable homes across the borough is set out in the ‘Review of affordable housing needs in the context of First Homes’ evidence study.</p> <p>It is also recognised that growth can help support local economies and local services. Land close to main urban area and the A21 trunk road (which runs through the High Weald AONB) in particular provides excellent opportunities for further employment provision to ensure sustainable growth.</p>
The cost of, and scope for, developing outside the AONB or meeting the	<p>All potential sites have been assessed as part of the SHELAA and Sustainability Appraisal. Both processes have given great weight to the conservation and enhancement of the AONB.</p> <p>The scope for developing outside the AONB has been fully realised. This includes allowing for a continuing supply of windfall sites, as set out in the ‘Brownfield and Urban Land Topic Paper’, as well as providing for strategic growth outside</p>

NPPF Test	Assessment
need for it in some other way	<p>the AONB, including via the promotion of a transformational urban expansion of Paddock Wood and a new garden village in the Green Belt.</p> <p>There are a number of settlements wholly in the AONB which, to varying degrees, provide local services and which have defined Limits to Built Development. This includes Cranbrook, Hawkhurst, Benenden, Brenchley, Goudhurst, Lamberhurst, Matfield, Sandhurst and Speldhurst. Therefore, any development at these settlements, even within the built-up area, would inevitably be in the AONB.</p> <p>Similarly, while the main urban area of Royal Tunbridge Wells/Southborough, and Pembury are excluded from the AONB, both have developed virtually up to the AONB; hence, further growth of these very sustainable settlements would also almost certainly be in the AONB.</p> <p>Paddock Wood is the only town outside the AONB. This is being identified for major urban expansion, with up to some 4,000 further dwellings in addition to the 1,000 in the current Site Allocations Local Plan. This is regarded as its full potential capacity.</p> <p>The scope for developing outside the AONB has not been restricted to the borough. Neighbouring authorities have been made aware of the need for major development in the AONB if the Borough Council is to meet its own housing need in full and were contacted to ask if there is scope for this to met elsewhere. These are set out in the Duty to Cooperate Statement.</p> <p>It is concluded that all reasonable alternatives for locating development outside of the AONB are being pursued.</p> <p>Furthermore, it is evident that development to provide for homes and jobs at sustainable settlements within, or surrounded by, the AONB will need to be in the AONB.</p> <p>The focus of site allocations in the AONB is on small-scale sites. All suitable smaller sites are being proposed for allocation.</p> <p>At the same time, regard is given to the particular elements that larger development may contain, such as provision of significant economic, community or green infrastructure, for which there is a public benefit.</p>
Any detrimental	The merits of each proposed allocation are considered as part of the site-specific assessments in Appendix 3 and summarised

NPPF Test	Assessment
effect on the environment, landscape and recreational opportunities, and the extent to which that could be moderated	<p>below.</p> <p>These assessments include particular regard to the impacts on the key components of the AONB and the extent to which these are proposed to be moderated or enhanced, and the cumulative effect on the individual settlements.</p> <p>While the NPPF refers to the assessment of the effects of proposals on an individual basis, the cumulative effects of proposed allocations at settlements in the AONB, as well as their respective effects, are also considered through the Sustainability Appraisal.</p>

## Overview

- 6.157 The High Weald AONB is recognised as being a nationally, as well as locally, important asset. Every effort has been made to limit the extent as well as the impacts of development on it and especially on its distinctive characteristics on which its designation is based. For all proposals, not just those that are identified as 'major', an assessment has been made of AONB impacts – and sites often rejected on these grounds - having proper regard to the 'great weight' given to its conservation and enhancement.
- 6.158 Regard has been had to the extent to which adverse effects on the landscape can be avoided and/or mitigated as well as the extent to which the proposed allocations can support the local communities and provide landscape benefits.
- 6.159 It is noted that the net effect of the further work post the Draft Local Plan has been to substantially reduce the extent and quantum of sites in the AONB now being proposed for development. The number of allocations in the AONB has reduced from 49 to 32, while the total number of dwellings proposed for allocation is now for 1,370 dwellings, a reduction of 47% from the Draft Local Plan total of 2,588 dwellings.
- 6.160 The 32 allocations now proposed are primarily residential, or residential-led, but also include ones for employment, health-related and playing field/recreation uses. Also, of the 24 residential allocations, 3 include some form of community facility.
- 6.161 The number of major developments (including cumulative assessments) is reduced from the 19 at Regulation 18 stage to 11 currently. The 11 majors include one site at Cranbrook that has now been split into two but is no larger overall than at Regulation 18 and one additional major site has been added as it was consented at a recent appeal. The majors include 4 sites that individually could be considered 'non-major' but are uprated to 'major' when the cumulative effect of adjacent sites is taken into consideration. Moreover, the one substantial individual proposed site allocation in the Draft Local Plan, for 400-450 dwellings at Hawkhurst, is no longer

promoted, primarily due to AONB impacts. The largest single proposal is now for just over 200 dwellings.

- 6.162 Hence, for residential developments, the greater part, (69%) are smaller schemes. This is in line with the ‘indicator of success’ for Objective S2: ‘To protect the historic settlement pattern and character of settlement’ of the AONB Management Plan, which seeks that: *“Greater proportion of new homes delivered through redevelopment or small developments.”*
- 6.163 Most of the ‘non-major’ sites for housing fall between 10 and 30 units, with just two having a potential maximum above this, of 45 and 60 respectively. However, it should be noted that one relatively small site of 35-45 dwellings is considered ‘major’, in part due to its close relationship with characteristic AONB features.
- 6.164 The amount of employment land allocated has also reduced. An allocation for some 10,000sqm to the east of Royal Tunbridge Wells is not now being pursued, as it is not now considered to meet the exceptional circumstances threshold. Also, the extent of employment allocations at Gills Green, Hawkhurst is reduced in scale following landscape appraisal, with more landscape treatment incorporated as well.
- 6.165 In fact, for those sites now being carried forward to the Pre-Submission Local Plan, the framing of policies now closely reflects the LVIA findings, which in many cases involves reducing the number of proposed dwellings and/or areas of development.
- 6.166 The comparison between the Regulation 18 and current, Regulation 19 proposals is contained in Appendix 4.
- 6.167 The Council is also conscious of the cumulative effect of growth in the AONB within the context of ensuring that the overall scale and extent of development is limited. With this in mind, as set out in Appendix 5, it is noted that:
- 69% of the borough within the AONB
  - the number of dwellings on developments proposed in the AONB amount to some 14.6% of all allocations
  - major developments in the AONB account for 10% of all residential allocations
  - the amount of land allocated in the AONB totals some 175 hectares of land, of which some 82 hectares is developable area and some 87 hectares is open space/landscaping areas/buffers (i.e. the developable area is about a third of 1% of the total AONB area within the borough)
- 6.168 This is regarded as more limited scale and extent and illustrates the weight given to the AONB and the “exceptional” nature of the allocations within the overall strategy, given the composition of the borough.
- 6.169 At the individual site level, the impact on the AONB of all proposed site allocations, and of alternatives, has considered the site in its context, the presence of notable and most importantly, AONB features, the likelihood of such features being adversely affected and the scope for not only moderating adverse effects but also

noting what opportunities for enhancement that development could bring. Quite properly, assessments also have taken account of both the local circumstances, including development needs, as well as site-specific, and scheme-specific considerations.

- 6.170 Sites found to meet the relevant tests and suitable for allocation are typically those in a sustainable location, with limited negative effects on the wider AONB and/or AONB components and/or can make a positive contribution to AONB and landscape objectives and/or generate other wider public benefits, such as affordable housing and community infrastructure.
- 6.171 While some 'major' developments are proposed, the review of both national AONB policy and the defining characteristics of the High Weald AONB, in addition to individual site circumstances has led the Council to reject options put forward for strategic growth of the scale of a new settlement in the High Weald AONB. This is elaborated upon in Part G in relation to locations for strategic growth.



# **I. Exceptional circumstances for Green Belt releases**

- 6.172 Approximately 22% of the borough lies within the Metropolitan Green Belt (MGB), representing a total of 7,134 ha. 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 developed boundary of Paddock Wood.
- 6.173 The majority (5,231 hectares) of the Green Belt is also designated as AONB. The area that is also AONB land is mainly located around the edge of the main urban areas of Royal Tunbridge Wells and Southborough and around the built area of Pembury. The main area of Green Belt outside the AONB lies to the west of Paddock Wood. This includes land on the western side of Paddock Wood and the land put forward for a new settlement at Tudeley, as discussed in Part G above.

## **Exceptional circumstances to release Green Belt land**

- 6.174 Paragraph 136 of the NPPF states that, once established, Green Belt boundaries should only be altered where 'exceptional circumstances' are fully evidenced and justified, through the preparation or updating of plans.
- 6.175 Paragraph 137 of the NPPF requires that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, it is necessary for the Council to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, including making as much use as possible of suitable brownfield sites and under-utilised land, optimising density of development (including policies that promote a significant uplift in minimum density standards in town centres and other locations well served by public transport), and informed by discussions with neighbouring authorities about whether they could accommodate some of this borough's identified need for development.
- 6.176 Neither the NPPF nor the Planning Practice Guidance (PPG) provide a formal definition and/or set of criteria as to what circumstances could be considered as exceptional. As a result of other local planning authorities proposing to alter Green Belt boundaries through the preparation of their Local Plans, case law has identified a number of points that can be used as guidance.
- 6.177 Of particular note, in the case of Calverton Parish Council v Greater Nottingham Council's 2015 High Court Judgment, where the objectively assessed housing need (OAN) has already been determined, the following issues were raised:
- 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; and
- 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.

- 6.178 Case law has also established that general planning merits cannot alone be exceptional circumstances. For example, it is not sufficient to redraw Green Belt boundaries based on a site being considered to be in a sustainable location.
- 6.179 It is for the Council to determine whether it considers exceptional circumstances exist to justify amending Green Belt boundaries through the preparation of its new Local Plan taking account of the level of harm to the Green Belt that is likely to arise from the proposed release(s).
- 6.180 For clarity, within the context of the exceptional circumstances, it is appreciated that NPPF paragraph 11 does not make meeting identified needs for housing and other uses a requirement; rather, it advises that the '*protection of assets of particular importance*', which include both AONBs and Green Belt, may provide '*a strong reason for restricting the overall scale, type or distribution of development in the plan area*'.
- 6.181 In the light of the NPPF, supporting PPG and case law, the Council has undertaken a range of further work, beyond that for the Draft Local Plan to address the issues that require due consideration, including that relating to housing needs and supply, economic development needs, Green Belt impacts, impacts on the setting of the AONB and an update of the SHELAA. The Sustainability Appraisal has also been updated, also taking account of comments at the Draft Local Plan stage.
- 6.182 The Council has commissioned Land Use Consultants (LUC) to carry out three iterations of Green Belt study to inform each stage of Local Plan preparation:
1. Its initial State 1 'Green Belt Strategic Study', was published in November 2016. By establishing the extent to which areas of Green Belt fulfils the purposes for which it was designated, this study informed further work on whether any of the borough's Green Belt could be amended. It identified individual parcels and broad areas as being areas in which there is a possibility that land may not make a strong contribution to Green Belt purposes.
  2. The Stage 2 assessment comprised a more detailed and focused review of areas of land around identified settlements. An overall rating was given to each parcel to indicate the level of harm that could be caused to the Green Belt were the area in question to be released from the Green Belt, rating the contribution to purposes 1 to 4 of the Green Belt on a five-point scale from high to low. The fifth purpose (to assist in urban regeneration by encouraging the recycling of derelict and other urban land) was not assessed as all land was considered to make an equal contribution to this purpose).

3. The final Stage 3 study has provided more refined information and assessment to inform the site assessment process for the Pre-Submission Local Plan, when drawing up site allocation policies for sites located within the Green Belt and when making decisions to amend Green Belt boundaries including consideration of harm to the remaining Green Belt. These studies are available under 'Pre-Submission Supporting Documents' on the Local Plan website and their findings inform the assessments in Part I of Section 6.

## **Application of exceptional circumstances to Green Belt sites**

- 6.183 The following factors are considered to contribute to exceptional circumstances specific to this borough to justify the proposed changes to Green Belt boundaries:
- a) The borough is heavily constrained – Aside from the 22% of the borough designated as Green Belt, 69% is AONB, with 5,321 ha of Green Belt land (out of 7,134 ha) also being within the AONB. This means that 74.5% of the Green Belt land is also 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 developed boundary 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 requirement identified through the Standard Method is more than double that required for the Core Strategy 2010. Although it is the case that the main reason for releasing land from the Green Belt is to deliver housing, other types of development are also proposed. The Economic Development Topic Paper identifies that at least 14 hectares of new employment land should be provided in order to support the creation of new employment opportunities alongside the provision of new 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). Details of the Council's contact with its neighbours in both Kent and in East Sussex in relation to housing needs are set out in the 'Duty to Cooperate Statement'.

- f) All reasonable options to deliver development within the borough without releasing land in the Green Belt have been fully examined and utilised; details are provided in other sections of this Topic Paper, but are summarised below:
- i. As set out in Section 6E, a robust provision for windfall development has been made, identifying greater capacity than at the Draft Local Plan stage. This will promote development within existing built-up areas. The potential for more brownfield development has been reviewed as part of this work; indeed, many windfall sites are on brownfield land.
  - ii. The densities of proposed allocations have been reviewed, and it is shown that sites within the main urban areas are generally expected to deliver higher densities than those in a more rural location, with 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, which are also subject to their own 'exceptional circumstances' test. However, a conclusion has been reached, as elaborated upon in Part E, that there is no further capacity within the AONB 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 to deliver mixed development that meets identified needs. In the site allocation policies in the Local Plan, the Council has sought to allocate uses appropriate to a site's location whilst also ensuring that the development needs identified in the Local Plan, including the necessary infrastructure to support development, are delivered.

6.184 The Council's approach and assessment of potential development sites has resulted in a great many of those sites within the Green Belt and AONB being rejected as unsuitable on Green Belt and/or AONB grounds and so these designations have significantly restricted "*the overall scale, type or distribution of development in the plan area*".

6.185 In conclusion, the Council considers that the above factors, together provide a basis for establishing exceptional circumstances to alter the boundaries of the Green Belt

and removing land from it in order to deliver the extent and quantity of development in the Local Plan. In particular these factors support the proposals for strategic development in the Green Belt of land at Paddock Wood and eastern Capel and at Tudeley (also located within Capel parish) for a wide range of land uses, including built development, to deliver strategic development opportunities.

6.186 In terms of these two sites themselves, there are additional site and development specific circumstances, which are considered to contribute to exceptional circumstances:

- For land at Capel and Paddock Wood:
  - the land proposed to be released from the Green Belt here is part of a wider release of non-Green Belt land to deliver development in a sustainable location, around an existing settlement, with the potential to rejuvenate and revitalise the town centre: approximately 48% of the total area of land included for the comprehensive urban extension is currently designated as Green Belt;
  - through the comprehensive development of this site, and particularly the land to the west of Paddock Wood (i.e. that which would be released from the Green Belt), it has been identified through the Strategic Flood Risk Assessment that there is the potential for the flood mitigation required in association with this development to deliver “betterment” through reduced flood risk to existing areas of Paddock Wood and its surrounds. This requirement is specifically included in the policy, and is considered to make a significant contribution to the exceptional circumstances for the release of this land from the Green Belt;
  - Expansion of the town offers opportunities both within the new development and existing development to increase the use of alternative modes of transport (to cars) for local journeys, improve Green Infrastructure and taken together with land at Tudeley there are opportunities to provide significant new highway infrastructure and localised highways improvements.
- For Tudeley:
  - through the development of the site, and the provision of flood mitigation measures on the wider landholding of the site owner, it is considered that there is the potential to reduce the existing flood risk to areas within Five Oak Green. This requirement is specifically included in the policy, and contributes to the exceptional circumstances for the release of this land from the Green Belt
  - furthermore, the proposal represents an opportunity to deliver development of exemplar design quality, with exceptional permeability and low levels of private car use within the settlement. This requirement is again specifically included in the policy, is considered to make a significant contribution to the exceptional circumstances for the release of this land from the Green Belt;

- Development at Tudeley also provides a site for a secondary school to meet the needs of the wider area.
- The site and surrounding land being largely in single ownership enables the scheme to offer a new green route into Tonbridge and improvements to the landscape and accessibility of the countryside beyond the allocation boundary. Full consideration has been given to links both within the allocation boundary, and beyond, with inter urban pedestrian and cycle links fully considered.
- Taken together with the expansion of Paddock Wood including in land in Capel parish, there are opportunities to provide significant new highway infrastructure and localised highways improvements.
- The masterplans and detailed design process for Policies STR/SS1 and STR SS3 will create significant open spaces and improve existing, or deliver new, landscape buffers (with built development set back from boundaries) within the new developments to ensure the openness of the surrounding areas remaining within the Green Belt is not unduly compromised (as well as providing areas of amenity space within the allocated areas). Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach.

6.187 Whilst the strategic issues set out above support the release of Green Belt for the full list of Green Belt sites there are also local and site-specific factors for each site that may be taken into account as part of exceptional circumstances including;

- The level of harm to the Green Belt that is likely to arise from the specific release
- The predicted harm to adjacent remaining Green Belt
- Localised need issues.
- Site specific measures available to ameliorate any harm
- The context and nature of the site such as areas of previously developed land, site condition and locational advantages.

6.188 These are set out in the tables below and Appendix 1.

## **Amendments to the Green Belt boundary**

6.189 Based on the above approach and outcomes, it is therefore considered necessary to consider whether sites located within the Green Belt are suitable to deliver development in order to meet the development targets of the new Local Plan.

6.190 For each site allocation in the Local Plan where it is proposed to amend the Green Belt boundaries (a site allocation can comprise one or more sites), a detailed assessment process has been carried out to identify site-specific circumstances to

support this release of land from the Green Belt. This has been an iterative process, taking account of the specific circumstances of the site(s), the proposed development to be delivered, and mitigation to be provided. This assessment process is set out below.

- 6.191 The assessment carried out to understand and identify land in the Green Belt with a view to possible release(s) has followed a three-stage process by the same consultant. The Green Belt studies have fed into a detailed assessment of individual sites using the outcomes and recommendations of the studies as part of the wider site assessment work carried out for all sites through the SHELAA process.
- 6.192 The Green Belt Study Stage 1 was a strategic assessment of the Green Belt in the borough in the context of the wider MGB and Green Belt within adjacent local authorities. It was undertaken in relation to the contribution of areas of land ('broad areas') to each of the five Green Belt purposes (NPPF paragraph 134).
- 6.193 The Stage 1 study identified for each broad area whether it was considered to provide a strong contribution to each of the Green Belt purposes, suggested 35 parcels and 10 broad areas for assessment at Stage 2, as well as providing an overview for each parcel and broad area of the main considerations that would need to be taken account of when carrying out a Stage 2 assessment.
- 6.194 The Stage 2 assessment comprised a more detailed and focused review of land around identified settlements and assessed 45 parcels/sub parcels and the 10 broad areas. An overall rating was given to each parcel to indicate the level of harm that could be caused to the Green Belt were the area in question to be released from the Green Belt, rating the contribution to purposes 1 to 4 of the Green Belt on a five-point scale from high to low. The fifth purpose (to assist in urban regeneration by encouraging the recycling of derelict and other urban land) was not assessed as all land was considered to make an equal contribution to this purpose).
- 6.195 The outcomes from the Stage 1 and 2 Studies informed the Draft Local Plan, while the final Stage 3 study has provided more refined information and assessment to inform the site assessment process for the Pre-Submission Local Plan, when drawing up site allocation policies for sites located within the Green Belt and when making decisions to amend Green Belt boundaries.
- 6.196 In total, the PSLP intends to release areas of Green Belt on 15 proposed allocation sites totalling some 407.576 ha, or 5.71%, of the Borough Green Belt (Appendix 1) . Of those the overall harm from the release of ten sites is predicted by the Stage 3 report to be Low-Moderate to Very Low, a further three are predicted to result in a Moderate level of harm and the remaining two, the strategic development at Paddock Wood and Tudeley Village, would give rise to a High level of harm. No sites give rise to Very High harm. The overall harm rating predicted by the Stage 3 Green Belt report is set out in Table 4 below.

Table 4: Overall Green Belt harm rating of sites proposed to be released

<b>Allocation Site</b>	<b>Settlement</b>	<b>Overall Harm Rating</b>
AL/RTW 5: Land to the north of Caenwood Farm, Speldhurst Road	Tunbridge Wells	<b>Low-Moderate</b>
AL/RTW 14: Land at Wyevale	Tunbridge Wells	<b>Low-Moderate</b>
AL/RTW 16: Land to the west of Eridge Road at Spratsbrook Farm	Tunbridge Wells	<b>Low-Moderate</b>
AL/RTW 17: Land adjacent to Longfield Road	Tunbridge Wells	<b>Moderate</b>
AL/RTW 19: Land north of Hawkenbury Recreation Ground	Tunbridge Wells	<b>Moderate</b>
RTW Safeguarded Land: Land at Colebrook House, Pembury Road	Tunbridge Wells	<b>Moderate</b>
STR/SS 1 Land at Capel and Paddock Wood	Paddock Wood	<b>High</b>
STR/SS 3: Tudeley Village	Tudeley Village	<b>High</b>
AL/PE 1: Land rear of High Street and west of Chalket Lane	Pembury	<b>Low</b>
AL/PE 2: Land at Hubbles Farm and south of Hastings	Pembury	<b>Low</b>
AL/PE 3: Land north of the A21, south and west of Hastings Road	Pembury	<b>Low</b>
AL/PE 4: Land at Downingbury Farm, Maidstone Road	Pembury	<b>Low-Moderate</b>
AL/PE 5: Land at Sturgeons fronting Henwood Green Road	Pembury	<b>Very Low</b>
AL/PE 7: Cornford Cornford Lane	Pembury	<b>Low</b>
AL/SP 1: Land to the west of Speldhurst Road and south of Ferbies	Speldhurst	<b>Very Low</b>

6.197 In addition to the detailed site assessment process described in the SHELAA Report, for all sites located in the Green Belt the following additional assessment work was carried out:

- An analysis of the percentage of the site in the Green Belt;



- A review of the outcomes of the Green Belt Studies to determine, by broad area and/or by smaller parcel as appropriate, the contribution(s) made by each site area included within a proposed site allocation area towards Green Belt criteria. Each site was considered in terms of how it currently functions/contributes towards the first four Green Belt purposes. Outcomes of the Green Belt Studies Stages 1 and 2 were used to inform this process, including an assessment of how localised any impact of proposed development would be upon the immediate surrounding Green Belt compared with any impact upon the wider area, particularly in terms of retaining the openness and permanence of adjacent Green Belt areas (ref para 133 NPPF) (but not including a landscape assessment – this is not a Green Belt consideration; landscape assessments have been included within the wider site assessment process);
- A review of the outcomes of the Green Belt Studies to determine the existing Green Belt boundary strength and if this can be strengthened and made more permanent through development opportunities taking note of the observations and recommendations in the Green Belt Studies;
- Review, against Table 6.2 Potential Beneficial Uses of Green Belt (Stage 2 Assessment), what possible contributions development included in a proposed allocation can make to Green Belt objectives in terms of improving access, providing locations for outdoor sport, landscape and visual enhancement, increasing biodiversity, and improving damaged and derelict land.

6.198 The outcomes of this process were used to reach a conclusion about the suitability of an individual site to be released from the Green Belt and to then identify and formulate specific criteria to be included in site allocation policies to:

- a) minimise the impact of development proposals upon the surrounding Green Belt, taking into account the proposed type and scale of development as well as the site allocation's relationship with adjacent areas, topography, landscape features etc, to include policy requirements for new and/or additional landscape buffers, as well as provision of open spaces within the site allocation area;
- b) identify those types of development that can contribute to Green Belt objectives and their most appropriate location within the allocation; and
- c) provide opportunities for delivery of strategic infrastructure and/or betterment, for example to alleviate flood risk/provide opportunities for improved surface water management, provision of improvements to health facilities that serve both this borough and the wider area.

6.199 For the two areas involving a relatively large release of land from the Green Belt, being site allocation policies STR/SS1 Land at Capel and Paddock Wood (release of approx. 148 ha of land in the Green Belt) and STR/SS3 Tudeley Village (release of approx. 168 ha of land in the Green Belt), the outcome of the assessment of the potential of land borough-wide to deliver a garden settlement (as explained in the Garden Settlement section of this Topic Paper above), is fundamental in supporting the release of Green Belt land at these two locations.

6.200 The assessments undertaken to determine the most appropriate locations for a garden settlement were unable to identify sufficient suitable and deliverable land in areas wholly outside of the Green Belt. The SHELAA and Sustainability Appraisal sections in this Topic Paper provide further details regarding this.

6.201 Having undertaken this process, the Council considers that there are exceptional circumstances to alter the boundaries of the Green Belt to remove land from the designation in order to enable the Local Plan to include proposals for development in the Green Belt that fall under the following headings:

- Release of areas of land at Paddock Wood (located within the eastern part of Capel parish, Allocation Policy STRSS1, and at Tudeley (located within Capel parish, Allocation Policy STR/SS3, for a wide range of land uses, including built development to deliver strategic development opportunities.

The land to be released from the Green Belt at Paddock Wood is part of a wider release of non-Green Belt land to deliver development in a sustainable location; approximately 48% of the total area of land included in Policies STR/SS1 is currently designated as Green Belt. The masterplans and detailed design process for Policies STR1, STR2 and STR3 will create open space and improve existing, or deliver new, landscape buffers (with built development set back from boundaries) within the new developments to ensure the openness of the surrounding areas remaining within the Green Belt is not compromised (as well as providing areas of amenity space within the allocated areas). Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach;

- A number of brownfield sites on the edge of settlements

The development of such areas as part of a wider site allocation supports the fifth purpose of the Green Belt (para 134 NPPF), this being to assist in urban regeneration, by encouraging the recycling of derelict and other urban land; an approach that is pertinent for this borough with a finite supply of urban land available for redevelopment;

- Individual site allocations located on the edge of settlements.

Individual (mainly smaller scale) sites have been identified as logical extensions to the existing LBD of a settlement, or as a 'rounding off' small local adjustment to the Green Belt boundary (and in some cases providing a stronger Green Belt boundary), and where all other planning considerations support the allocation, facilitating development in a sustainable location. For example, the release of Green Belt land at a number of locations at Pembury will provide a range of development opportunities, including housing and community facilities, in a sustainable location;

- Extension to the main urban area of Royal Tunbridge Wells and Southborough (including in association with other sites not located in the Green Belt)

These are to deliver employment land to meet strategic development requirements in the Local Plan as well as land for leisure and recreation. This reflects the outcome of the Economic Needs Study (ENS) that recommended the expansion of Key Employment Areas, including that at North Farm/Longfield Road in Royal Tunbridge Wells. Additionally, the ENS recognised the area around the A21 highway improvements as a location for significant growth potential. Both of these areas are predominantly located within the Green Belt.

- Areas providing opportunities for delivering important community/recreation facilities

This includes provision of a Sports Hub at Hawkenbury and land for a cemetery expansion at Pembury.

Table 5 below provides a summary of proposed site allocation policies in the Local Plan that contain land currently within the Green Belt. For each site allocation a summary is provided of the development type(s) proposed and whether it is intended the land within the site allocation area remains or is removed (entirely or in part) from the Green Belt and details any associated changes to Green Belt boundaries. The final two columns provide a summary relating to mitigation included in the policy criteria (full details provided by referencing the relevant site allocation policy) and a summary explanation to support the policy approach being taken. The detailed wording within each allocation policy ensures that mitigation will be provided as part of the delivery of development.

- 6.202 The approach being taken for each allocation has been informed by the outcomes and recommendations of the process described above, taking account of the outcomes of the Green Belt Study at a site-specific level as well the assessment of planning opportunities and constraints.

Table 5: Summary of proposed site allocation policies in the Local Plan that contain land currently within the Green Belt

Details	Development	Green Belt Outcome	Mitigation	Rationale
<b>AL/RTW 5</b> <b>Land to the north of Caenwood Farm, Speldhurst Road</b>	Residential use	<b>REMOVE PART</b> from Green Belt  The land to be released from the Green Belt is the allocation less a landscape buffers to the south west which is to be retained.  Area to be removed 5.61ha	Woodland to south west retained and included within allocation to provide new strong GB boundary. Enhancements to local PROW that goes through site.	Very sustainable location adjacent to the main settlement and LBD but outside the AONB.
<b>AL/RTW 9</b>	Retirement	<b>RETAIN</b> in Green Belt	VSC and mitigation	Site Allocation in SALP 2016 with

Details	Development	Green Belt Outcome	Mitigation	Rationale
<b>Land at Beechwood Sacred Heart School</b>  SALP site/ Planning approval granted	housing C2	Note only a small overlap between development and GB.	assessed under the extant consent.	planning approval for development.
<b>AL/RTW 14</b>  <b>Land at Wyevale Garden Centre, Eridge Road</b>	Expansion of the existing Use Class E (a) commercial use (garden centre) with an element of residential	<b>REMOVE PART</b> from Green Belt  The land to be released from the Green Belt is the allocation less the landscape buffers (which are to be retained as landscape features) and a narrow strip to the south that would be otherwise left to ensure that the GB follows strong features on the ground that will endure.  Area to be removed from GB 5.521 ha	The proposed allocation includes significant landscape buffers/enhancement particularly to the north to strengthen the Green Belt boundary.	Railway to south provides strong boundary feature; allocation improves weak northern boundary.  Area proposed for development is either already developed or has previously been subject to development. Site improves local pedestrian permeability.
<b>AL/RTW 16</b>  <b>Land to west Eridge Road at Spratsbrook Farm</b>	Residential	<b>REMOVE PART</b> from Green Belt  Only the southern part, which is proposed for development, will be released from the Green Belt where it adjoins existing development.  The release will extend over an adjacent isolated property (not in the allocation) to provide a clear and enduring boundary.  It should be noted that	Large area of open space to provide buffer and strong Green Belt boundary.	Sustainable location on edge of main settlement with connections to town and rural landscape. Can improve landscape approach to RTW.

Details	Development	Green Belt Outcome	Mitigation	Rationale
		<p>the Green Belt and site border Sussex where there is no Green Belt. This is the straight line that follows the Borough and County boundary.</p> <p>Area to be removed from GB 6.332 ha</p>		
<p><b>AL/RTW 17</b></p> <p><b>Land adj to Longfield Road</b></p> <p>Planning permission subject to 106 agreement.</p>	Employment uses	<p><b>REMOVE PART</b> from Green Belt</p> <p>The northern section is not to be built on and will remain in the Green Belt and the boundary will be drawn following a block of woodland running along the northern edge of the open grassland.</p> <p>The site is adjacent to RTW Safeguarded Land at Colebrook House and there is a small strip of land between the two, which in order to provide a strong Green belt boundary, will be removed.</p> <p>Area to be removed from GB 20.235 ha</p>	<p>Strategic landscape scheme</p> <p>The northern section of this allocation contains important features for landscape and ecology and is included in the allocation for landscape and ecological mitigation and is not to be built on.</p>	Provides employment in sustainable location; A21 provides strong MGB boundary; Well Wood to north marks Green Belt edge on adjacent development
<p><b>AL/RTW 19</b></p> <p><b>Land to north of Hawkenbury Recreation Grd</b></p> <p>Planning approval granted (for change of use, not built</p>	Recreation	<p><b>REMOVE</b> from Green Belt</p> <p>Whilst the use of the site for recreation might be considered appropriate development within the Green Belt it is also likely to include some built elements that might be considered “inappropriate”.</p>	<p>Provision of landscape buffer.</p> <p>Development mostly grass pitches.</p>	Recreational provision; sustainable location alongside existing recreational facilities. As it is proposed as a Sports Hub rather than just pitches it is to be removed

Details	Development	Green Belt Outcome	Mitigation	Rationale
elements)		<p>The most defensible boundary is the allocation boundary and so the whole of the allocation will be removed from the Green Belt.</p> <p>Area to be removed from GB -7.071ha</p>		from the GB.
<b>RTW Safeguarded land.</b>  <b>Land at Colebrook House</b>	Safeguarded for future employment uses.	<p><b>REMOVE</b> from Green Belt</p> <p>Whilst this site does have landscape and ecological constraints they are less clearly defined, and the more enduring boundary will be the site allocation boundary.</p> <p>The site is adjacent to RTW 12 and there is a small strip of land between the two, which in order to provide a strong Green belt boundary, will be removed.</p> <p>Area to be removed from GB 9.292 ha</p>	The site has landscape and heritage resources that can be protected enhanced through development.	Will provide for future employment (following 5 year review) in sustainable location adjacent to existing employment sites with opportunities for increased connectivity. A21 and adjacent landscape features provide strong Green Belt boundary
<b>AL/SO 2</b>  <b>Land at Mabledon House</b>	Re-development of listed building and historic park & garden to provide hotel, leisure and conference facilities	<p><b>REMAIN</b> in Green Belt</p> <p>This site straddles the boundary with Tonbridge and Malling BC with Green Belt on both sides and so has been subject to discussions with Tonbridge and Malling BC under Duty to Cooperate.</p> <p>The Council do not consider it necessary to release the site</p>	<p>All proposals to demonstrate exceptional circumstances supported by evidence of need to support development within this location.</p> <p>Policy requires a detailed and fully funded conservation plan and</p>	Redevelopment of existing listed buildings; historic park & garden in a sustainable location. Development can deliver significant landscape and heritage conservation benefits.

Details	Development	Green Belt Outcome	Mitigation	Rationale
		from the Green Belt in order to achieve the objectives of the proposed allocation.	scheme of restoration for the built heritage assets and the historic park and garden.	
<b>STR/SS 1</b>  <b>Paddock Wood including land at east Capel</b>	Urban expansion – mixed use including residential, schools, community facilities and employment land.	<p><b>REMOVE</b> from Green Belt</p> <p>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.</p> <p>At the northern tip the Green Belt boundary meets the Borough boundaries of Maidstone Borough and Tonbridge and Malling Borough requiring consultation under Duty to Cooperate with both Boroughs.</p> <p>The allocation extends to B2017 Badsell Road to the south but here the Green Belt boundary extends slightly further south cutting across the landscape</p>	To be delivered following garden settlement principles; master planned approach; provision of new/improved access to wider surrounding countryside with measures to strengthen the remaining Green Belt.	To provide strategic development opportunities; infrastructure led; betterment, particularly in relation to flooding

Details	Development	Green Belt Outcome	Mitigation	Rationale
		<p>following no distinct boundary and so it is proposed that the Green Belt boundary is pulled back to follow the B2017/Colts Hill A228 as a defensible boundary.</p> <p>There is also a small anomaly to the west at the junction of Badsell Road B2017 and Colts Hill A228 where the Green Belt boundary again follows no particular boundary and, so, it is proposed that the Green Belt be extend here to follow the A228.</p> <p>Area to be removed from GB 148.194 ha</p>		
<b>STR/SS 3</b>  <b>Tudeley Village</b>	<p>New garden settlement to include residential, schools, community facilities and employment land.</p>	<p><b>REMOVE</b> from Green Belt</p> <p>This proposed site is wholly within the Green Belt and it is proposed that the release of the Green Belt will be slightly greater than the allocation so that it follows “physical features that are readily recognisable and likely to be permanent” and does not create isolated anomalous pockets.</p> <p>Green Belt release will extend beyond the allocation boundary southwards up to the B2017 and to the west and north to the edge of Hartlake Road and Sherrenden Road and will include pockets of</p>	<p>To be delivered following garden settlement principles; master planned approach; provision of new/improved access to wider surrounding countryside and measures to strengthen the remaining Green Belt.</p>	<p>To provide strategic development opportunities; infrastructure led; betterment (flood mitigation)</p>



Details	Development	Green Belt Outcome	Mitigation	Rationale
		land surrounded by the proposed allocation.  Area to be removed from GB 182.994 ha		
<b>AL/PE 1</b>  <b>Land rear High Street/west of Chalket Lane</b>  <b>And AL/PE 7</b>	Residential and additional parking for Village hall.  68-suite integrated community healthcare facility,	<b>Remove Part</b> from Green Belt  To accommodate the proposed allocations the Green Belt boundary will be moved away from the settlement to the south west to an existing tree line that follows the top of the A21 embankment. This extends to include an existing nursing home on Cornford Lane. This ties in with proposed Green Belt changes on adjacent development proposals.  A significant area within the allocation that is to be retained for landscape and ecological reasons will be retained in the Green Belt.  Area to be removed from GB 7.603 ha	Significant landscape feature/area retained as Green Belt and significant new landscape buffers required.  Requirements for walking/cycling links into Pembury village centre and wider countryside.	Sustainable location on edge of settlement with localised impact; creation of stronger boundary to Green Belt.  Improved walking/cycling routes through allocation sites and support for improvements to links to RTW.
<b>AL/PE 2</b>  <b>Land at Hubbles Farm/south of Hastings Road</b>	Residential; safeguarding cemetery expansion	<b>REMOVE PART</b> from Green Belt  To accommodate the proposed allocation the Green Belt boundary will be moved away from the settlement to the south west to an existing tree line that follows the top of the	Significant new landscape buffers required. Safeguarded land to remain in MGB.  Requirements for walking/cycling links into	Sustainable location on edge of settlement with localised impact; creation of stronger boundary to Green Belt.  Improved walking/cycling

Details	Development	Green Belt Outcome	Mitigation	Rationale
		<p>A21 embankment. This ties in with proposed Green Belt changes on adjacent development proposals.</p> <p>An area within the allocation that is to be retained for the possible future expansion of the cemetery is to be retained in the Green Belt.</p> <p>Area to be removed from GB 4.653 ha</p>	Pembury village centre and wider countryside.	routes through allocation sites and support for improvements to links to RTW.
<b>AL/PE 3</b>  <b>Land north A21/south &amp; west of Hastings Road</b>	Residential	<p><b>REMOVE PART</b> from Green Belt</p> <p>To accommodate the proposed allocation the Green Belt boundary will be moved away from the settlement to the south west to an existing tree line that follows the top of the A21 embankment. This ties in with proposed Green Belt changes on adjacent development proposals.</p> <p>Area to be removed from GB 5.463 ha</p>	<p>Significant new landscape buffers required.</p> <p>Requirements for walking/cycling links into Pembury village centre and wider countryside.</p>	<p>Sustainable location on edge of settlement with localised impact; creation of stronger boundary to Green Belt.</p> <p>Improved walking/cycling routes through allocation sites and support for improvements to links to RTW.</p>
<b>AL/PE4</b>  <b>Land at Downingbury Farm, Maidstone Road</b>	Residential; safeguarding for medical expansion	<p><b>REMOVE PART</b> from Green Belt</p> <p>To accommodate the proposed allocation the Green Belt boundary will be moved northwards to an existing tree line that follows the top of the embankment to</p>	A suitable an robust buffer is provided for the new Green Belt boundary. Safeguarded land to remain in Green Belt.	A228 & Maidstone Road provides strong boundary to Green Belt. Development in a sustainable location that helps facilitate expansion of the

Details	Development	Green Belt Outcome	Mitigation	Rationale
		<p>the Pembury Bypass. The existing development of the Hospice in the Weald is included within the Green Belt but with the allocation of AL/PE4 a more enduring and rational boundary can be struck to the north of the Hospice in the Weald.</p> <p>The safeguarded land is to remain in the Green Belt.</p> <p>Area to be removed from GB 4.679 ha</p>		medical facility.
<p><b>AL/PE 5</b></p> <p><b>Land at Sturgeons fronting Henwood Green Road</b></p> <p>Extant consent</p>	Residential	<p><b>REMOVE PART</b> from Green Belt</p> <p>A small part of this site which is previously developed land extends into the Green Belt. To accommodate the proposed allocation the Green Belt boundary will be altered to include the whole allocation.</p> <p>Area to be removed from GB 0.049 ha</p>	Minimal effect dealt with by development management policies.	Sustainable location on previously developed land with minimal effect on Green Belt.
<p><b>AL/PE 7</b></p> <p><b>Cornford Court, Cornford Lane</b></p> <p><b>Consented</b></p>	Integrated community health care facility	<p><b>Remove from</b> Green Belt</p> <p>Area included in PE1 above</p>	Included in AL/PE 1 above	Previously developed land in a sustainable location with planning consent.
<p><b>AL/PE 8</b></p> <p><b>Owlsnest,</b></p>	Care home facility	<b>REMAIN</b> in Green Belt	Application has demonstrated VSC. Allocation	Previously developed land in a sustainable

Details	Development	Green Belt Outcome	Mitigation	Rationale
<b>Tonbridge Road</b>  <b>Consented</b>			includes a significant area of woodland that will be protected and enhanced by the development with improved public access.	location with planning consent.
<b>AL/SP 1</b>  <b>Land west of Speldhurst Road/south of Ferbies</b>	Residential	<b>Remove</b> from Green Belt  The area allocated for development will be removed from the Green Belt which will then follow a strong and clear field boundary to the west. This change alone will leave a small triangular area to the north covering the rear garden areas of adjacent residential properties with no feature on the ground to mark its extent. Therefore, it is proposed that these garden areas are also removed from the Green Belt.  Area to be removed from GB 0.964 ha	Retain hedges/trees along boundaries; landscape buffers to site boundaries	Localised impact; well related to existing development; sustainable location.
<b>AL/SP 2</b>  <b>Land adj Rusthall recreation ground</b>  Planning approval granted	Recreation	<b>Remain</b> in Green Belt  As this is allocated purely for recreation then the Green Belt Boundary in this location will remain unaltered.	Retain hedges, trees	Recreational provision (planning approval granted); sustainable location

- 6.203 The more detailed table in Appendix 1 provides, for each site allocation the area and percentages of Green Belt to be removed as well as a summary of the contribution each site makes to the purposes of the Green Belt, the harm to the remaining Green Belt and the overall predicted level of harm from the release identified by the Green Belt Study.
- 6.204 The Council has considered the possibility of Green Belt replacement, in particular to areas around Paddock Wood, having regard to the requirements of paragraph 135 of the NPPF. This sets out that new Green Belt should only be established in exceptional circumstances, requiring that any proposal should:
- a) demonstrate why normal planning and development management policies would not be adequate;*
  - b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
  - c) show what the consequences of the proposal would be for sustainable development;*
  - d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and*
  - e) show how the Green Belt would meet the other objectives of the Framework.'*
- 6.205 This sets a very high bar for such proposals and it is currently considered that the circumstances do not exist to justify such an approach and so no replacement Green Belt is currently proposed. The decision to not designate further Green belt around Paddock Wood is supported by the stage 3 Green Belt Study which found (5.32):
- "The question could therefore be asked as to whether the settlement should be inset within the Green Belt in order to constrain any further growth/sprawl in the future. The fundamental purpose of the Metropolitan Green Belt is to prevent the sprawl of London and, as part of that, preventing other settlements growing towards London. Therefore, it makes sense to prevent Tunbridge Wells, Paddock Wood and Tonbridge from merging into one another. However, as there are no sizeable urban areas to the east or south of Paddock Wood there would be no justification to extend the Green Belt in these directions. Furthermore, there are other settlements of a similar size to Paddock Wood lying on the outer edge of the Metropolitan Green Belt edge, including Snodland, Leybourne/Larkfield/ Ditton, Rochester/Chatham/Gillingham to the north-east; and East Grinstead and Crawley to the south-west. As such the location of Paddock Wood in relation to the Green Belt can be considered to be in keeping with other areas of the edge of the Metropolitan Green Belt".*
- 6.206 With the exception of one small area of increase in the Green Belt (in order to ensure that it follows a strong feature to provide an enduring boundary) it is not proposed that the Local Plan designates other land as replacement Green Belt in place of that to be removed from the Green Belt, but rather to set out how

compensatory improvements to the environmental quality and accessibility of remaining Green Belt land can be made.

- 6.207 This approach follows the guidance provided by the updates (July 2019) to PPG in relation to the Green Belt that requires, where it has been demonstrated that it is necessary to release Green Belt land for development, that compensatory improvements are made to the environmental quality and accessibility of the remaining Green Belt land. Policies are included in the Local Plan to ensure that such improvements are delivered, with a specific requirement in Policies STR/SS 1 and STR/SS 3 for such proposals to be agreed and secured through the masterplanning approach.
- 6.208 Paragraphs 138 and 139 of the NPPF provide requirements and guidance for drawing up and defining Green Belt boundaries. The above sections have explained that a number of sites and broad areas that include Green Belt are being allocated for development in the Local Plan. In some of these circumstances it is proposed to redraw Green Belt boundaries, following an approach that takes account of the NPPF requirements and the recommendations of the Green Belt Study. Changes are identified in the table above and have followed the principles set out below.
- Where an area of land is to be removed from the Green Belt, all new boundaries have been drawn to be clearly defined, as far as is possible, using physical features that are readily recognisable and likely to be permanent. These have included roads, rail and trackways, field boundaries, and boundaries to Ancient Woodland;
  - A number of sites in the Green Belt have been allocated to provide safeguarded land for future educational, medical, and community uses. These sites will remain, in their entirety, within the Green Belt;
  - A number of sites in the Green Belt have been allocated to deliver uses that are considered as not being an inappropriate use in the Green Belt, with reference to the examples given in para 146 of the NPPF. These sites will remain, in their entirety, within the Green Belt unless the use is part of a wider mixed use scheme;
  - A number of sites that it is proposed to release from the Green Belt include a policy requirement to retain and enhance significant landscape buffers along the boundaries and these buffers are indicated as such on the site plans. This will ensure a long term permanent and strong boundary for the new inner Green Belt boundary (for example, a major road route running alongside the boundary of a site), in some cases more so than is currently the case;
  - Where the above approach has resulted in a small area of Green Belt land being enclosed (or almost surrounded) by non-Green Belt land, this small area has also been taken out of the Green Belt to create a more robust, logical and more enduring long-term boundary.

- 6.209 In coming to a final judgement on Green Belt release the Council has taken into account the effect of the cumulative release of Green Belt land on the purposes as set out in the Stage 3 Green Belt study which concluded in respect of each purpose as follows:

**Purpose 1: check unrestricted sprawl of the large built up area (LBUA):**

*Sites adjacent to, or in proximity to, the LBUA will not affect the overall ability of the remaining Green Belt land surrounding the LBUA to function as intended in respect to Purpose 1. A sufficient band of Green Belt will remain around the urban area to prevent future urban sprawl. For the most part this land will remain strongly distinct from the urban area, meaning there will be no weakening of the contribution that it makes to checking the unrestricted sprawl of the large built-up area.*

**Purpose 2: prevent the merging of neighbouring towns.**

*The cumulative release of the allocation sites between Tunbridge Wells and Pembury will not cause any reduction in the physical distance between the towns, and the A21 and intervening woodland will help prevent any impact on the perceived separation between the towns. The creation of Tudeley Village will create a new settlement, large enough to be considered a town in terms of Purpose 2. The cumulative release of site allocations AL/CA1 (now STR/SS 3) and AL/PW1 (now STR/SS 1) will create a narrow overall gap between Tudeley Village and Paddock Wood, although the remaining Green Belt land will continue to play a strategic role in preventing these neighbouring 'towns' merging. No strong Green Belt separation between Tudeley Village and the inset village of Five Oak Green, but stronger separation will remain between Five Oak Green and Paddock Wood. The overall gap between Tonbridge and Paddock Wood will also be significantly reduced by the two allocations, but there will still be strong Green Belt separation between Tonbridge and Tudeley Village.*

**Purpose 3: assist in safeguarding the countryside from encroachment.**

*The draft allocation sites around Tunbridge Wells, Pembury and Speldhurst are predominantly located on land which does not have a strong distinction from the inset settlements. As such, the release of these area will not mark a step change in the settlement extent and development will occur on land with an existing physical and/or visual relationship with the urban areas. Release of the allocations at Tudeley Village and Paddock Wood will in themselves represent substantial encroachment on the countryside and will weaken the extent to which remaining Green Belt land particularly between Tudeley Village and Five Oak Green contributes towards safeguarding the countryside from encroachment.*

**Purpose 4: preserve the setting and special character of historic towns.**

*None of the draft allocations sites lie in proximity to Tonbridge. Draft allocation sites AL/RTW12, AL/RTW13, AL/RTW/16, AL/RTW/18 and AL/RTW23 are located adjacent to, or in proximity to, Tunbridge Wells and contribute to varying degrees to the setting of Tunbridge Wells. However, their cumulative release will not weaken*

*the contribution or affect the overall ability of the remaining Green Belt land surrounding Tunbridge Wells to function as intended with respect to Purpose 4*

- 6.210 It is considered that the level of harm identified is justified by the exceptional circumstances noted above and that the level of harm is for the most part relatively moderate to low. Whilst the Strategic sites at Paddock Wood and Capel do result in a significant encroachment into the countryside it is noted that in respect of Purpose 2 *“preventing the merging of neighbouring towns” that after the proposed release of Green belt land there will still be strong Green Belt separation between Tonbridge and Tudeley Village*”.
- 6.211 It can be seen that the harm to the remaining Green Belt is minor to negligible for all sites other than the Strategic Sites and even for these the harm is no more than moderate.
- 6.212 The policies for sites to be released from the Green Belt have benefited from the input of the Stages 2 and 3 Green Belt studies, such that mitigation for Green Belt effects is embedded within the policy wording and improvements to the remaining Green Belt will be sought through the planned development.



## J. Regard to climate change objectives

- 6.213 Climate change caused by human activity is a pertinent and current issue that will be felt across the whole borough. Impacts from climate change are wide and far reaching and include:
- increased risk of flooding,
  - more frequent and longer lasting heat waves,
  - increased likelihood of drought conditions,
  - reduced agricultural productivity,
  - species extinctions and reduced ecosystem functioning, and
  - negative impacts upon human health
- 6.214 The required response, underpinned by the Climate Change Act 2008, will need to be two-pronged involving a reduction in emissions and adaptation to the changes to which we are already committed.
- 6.215 Effective spatial planning can have a significant impact on both these responses. Indeed, the importance of addressing climate change is reflected in the NPPF (paragraph 148) which states places should be shaped in ways that contribute to “radical reductions in greenhouse gas emissions, minimising vulnerability and improving resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”
- 6.216 In this context, it would be appropriate to site new development in locations that reduce reliance on travel by private car and instead encourage sustainable and active modes of transport. Likewise, areas with vulnerability to flooding that cannot be improved should be avoided, alongside sites with biodiversity value. Finally, land should be considered for renewable energy generation both as a stand-alone project and through incorporation into planned new development.
- 6.217 The development strategy, supported by relevant Development Management policies, contributes to climate change objectives in terms of:
- a) Promoting effective use of brownfield sites – as put forward in Section E above
  - b) Focusing development within sustainable settlements and by defining Limits to Built Development (LBDs) around them
  - c) Embedding sustainability into all design and mandating this through the use of sustainable design standards (EN1 and EN2)
  - d) Incorporating a bespoke and ambitious policy for climate change mitigation and adaptation including renewable energy technology (EN3 and EN23)

- e) Implementing a biodiversity net gain target to ensure development increases the area of natural spaces which act as carbon sinks and provide valuable habitat for wildlife (EN9)
- f) Protecting and increasing opportunities for green, blue and grey infrastructure to assist with species movements (EN14)
- g) Encouraging use of active travel methods instead of private vehicles (EN21-22)
- h) Minimising use of potable water through conservation measures (EN24)
- i) Reducing flood risk and incorporating sustainable drainage systems (EN25 and EN26)

## K. Further consideration of development and flood risk

- 6.218 Tunbridge Wells Borough has an extensive and varied water environment and there are a number of key watercourses flowing through the area as well as areas of flood risk. Flood history shows that Tunbridge Wells Borough has been subject to flooding from several sources of flood risk, with the principal risk being from fluvial and pluvial sources, but also from surface water flooding. In accordance with the requirements of the NPPF and the NPPG, in relation to development and flood risk, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Government guidance requires that where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 6.219 The Borough Council has worked collaboratively with its consultants, officers of the Environment Agency and Kent County Council, as the Lead Local Flood Authority in developing the strategic distribution of sites proposed in the Pre-Submission Local Plan through the assessment work and formulation of the strategy as detailed below.

### Selection of sites

- 6.220 A Strategic Flood Risk Assessment (SFRA) has been produced to inform the Draft Local Plan and subsequently the Pre-Submission Local Plan and the distribution of development, including the proposed site allocations and policies contained within it. The SFRA has been prepared in two parts – a Level 1 SFRA for the whole borough and a Level 2 SFRA focusing on the land around Paddock Wood including land in east Capel. There has also been additional flood modelling work by the Council's consultants (JBA) in relation to the masterplanning of Paddock Wood and east Capel.
- 6.221 Local Authorities, when preparing a Local Plan, should demonstrate that they have considered a range of site allocations, using a Strategic Flood Risk Assessment to apply the Sequential and Exceptions Tests where necessary. The Sequential Test should be applied to steer new development to areas with the lowest probability of flooding. The Flood Zones, which have been refined through new detailed modelling for the area as part of the production of the SFRA (and have been agreed and adopted by the Environment Agency for planning purposes) provide the basis for applying the Sequential Test.
- 6.222 The aim is to steer development to Flood Zone 1 (areas with low probability of river or sea flooding). Where there are no reasonable available sites in Flood Zone 1, guidance states that Local Planning Authorities should take into account the flood risk vulnerability of land uses and consider reasonable available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception

Test if required. Only where there are no reasonably available sites in Flood Zones 1 and 2 should the suitability of sites in Flood Zone 3 (areas of high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

## The Level 1 Strategic Flood Risk Assessment (SFRA)

### 6.223 The Level 1 SFRA:

- Provides up to date information and guidance on flood risk for Tunbridge Wells Borough, considering the latest flood risk information in relation to up to date national policy
- Determines the variations in risk from all sources of flooding in Tunbridge Wells borough
- Assesses all potential sources of flooding and mapping of location and extent of functional floodplain (including detailed modelling to determine the extents)
- Assesses the standard of protection provided by existing flood risk management infrastructure
- Assesses the potential impact of climate change on flood risk
- Assesses locations where additional development may increase flood risk elsewhere
- Identifies critical drainage areas and recommendations on potential need for Surface Water Management Plans
- Identifies the requirements for site-specific flood risk assessments
- Determines the acceptability of flood risk in relation to emergency planning capability
- Considers opportunities to reduce flood risk to existing communities and developments

6.224 The Level 1 SFRA considers the sequential approach and how this should be carried out through the preparation of the Local Plan. It considers that the Sequential Test should be applied to the whole Local Planning Authority area to increase the likelihood of allocating development in areas not at risk of flooding. However, it is accepted that it is often the case that it is not possible for all new development to be allocated on land that is not at risk from flooding.

6.225 All of the sites across the borough that were submitted through the Call for Sites process have been screened against a suite of available flood risk information and spatial data to provide a summary of risk to each site (see Table 13-1 of the Level 1 SFRA). Information considered includes the flood risk datasets listed below and an indication is provided on the proportion of a given site affected by levels and types of flood risk.

- Flood Zones (present day)
- Future Flood Zone 3a in the 2080s epoch (Higher central and Upper end estimate)
- Risk of flooding from Surface Water
- Risk of flooding from Reservoirs
- Areas susceptible to Groundwater Flooding

- 6.226 The information provided in the above assessment informed the consideration of sites through the Strategic Housing and Economic Land Availability Assessment (SHELAA) following the sequential approach and was used to determine whether more detailed assessment of sites would be required as part of a Level 2 SFRA to further identify those sites that should be taken forward as potential development allocations.
- 6.227 The relatively extensive areas of land available for potential housing development in Zones 1 and 2 within the borough has made it possible to align the selection of housing land when performing the Sequential Test, so that all potential new housing sites can be located on land outside of the high-risk flood zone (Zone 3). Where potential housing sites are shown to comprise some land in a high-risk Flood Zone, proposed development will only be allowed to take place on land zoned as medium or low risk, and if appropriate any supplementary housing will be located on land immediately adjacent to the housing site on land in a medium or low risk zone.
- 6.228 In accordance with the Sequential Test and the Exceptions Test – those sites which are proposed to be allocated, that fall within or partly within areas of Flood Zone 2 or 3 have then been the subject of further work as part of the Exceptions Test carried out through the Level 2 SFRA.

## The Level 2 Strategic Flood Risk Assessment

- 6.229 The Level 2 SFRA was carried out following the completion of the Level 1 SFRA (and combined within the final reporting), with the main purpose being to inform the selection of options for Local Plan allocations and ultimately to support the determination of planning applications. The work focused on the area around Paddock Wood and land to the east of Capel Parish in accordance with the requirements of the Exceptions Test.
- 6.230 Specifically, the work included the following elements:
- Up to date information and guidance on flood risk for Tunbridge Wells Borough, considering the latest flood risk information and the current state of national planning policy;
  - An assessment of whether the principle of development could be supported at the proposed development locations (including consideration of cumulative

impacts) that are located within Flood Zones 2 and 3 and therefore the need to apply the Exception Test as referred to above;

- Consideration of the flood risk management adaption, infrastructure or other measures needed to support delivery of the proposed development;
- An assessment of a refined set of 'land parcels' for potential development;
- Updated fluvial flood risk modelling;
- An assessment of possible strategic flood risk management measures and associated flood risk metrics.

- 6.231 The testing completed as part of the Level 2 SFRA provides a strategic understanding of the potential effect of development and the potential for mitigation by implementing flood risk management measures. A number of sites (later amalgamated as 'parcels' through the assessment work) have been considered and some were discounted during this process as having failed the Exceptions Test at that stage – i.e. development was not considered appropriate due to the extent of current flood risk or predicted future flood risk and thereby was not considered suitable for allocation and discounted from any further assessment/consideration.
- 6.232 At each of the development parcels at Paddock Wood/Capel which were set out within the Draft Local Plan Policies AL/PW1 and AL/CA3 – Land at Capel and Paddock Wood), the strategic assessment generally shows that the principle of development can be supported. The proposed development, for the purpose of testing suitability has been positioned preferentially in lower fluvial flood risk zones within the parcels where possible, in accordance with the Sequential Test.
- 6.233 Consideration was also given to where flood risk management measures may be required in the future to manage flood risk in the borough (due to the influence of climate change on fluvial flood flows). It is considered that strategic provisions for future flood risk management may provide an opportunity to make a proposed development safe for the lifetime of the development, and the consideration of any off-set effects need to be considered. It was considered that some of the proposed development configurations tested as part of this work, are shown to have notable influence on flood risk, both within development parcels but also on existing areas of development in Paddock Wood. Also, some flood risk management measures have a large positive effect on flooding (e.g. depths and extents) in Paddock Wood, with the potential to provide 'betterment' for the existing settlement. It is acknowledged within the SFRA and was recognised in the Draft Local Plan Policies that future and more detailed assessment work should refine understanding of how flood risk measures may reduce flood risk, and their viability.
- 6.234 As previously referred to, a number of technical documents support the main SFRA reporting, including the Flood Risk Management Measures Report (which sets out the possible flood risk management measures available and appropriate to mitigate flooding in the areas around Paddock Wood/Capel) and Supporting Technical Notes

in relation to Flood Risk Management Measures costings, risk assessments and potential impact on existing properties/flood depths.

- 6.235 The amalgamation of the above work supported the proposed allocation of sites within the Draft Local Plan and provides technical evidence which can be taken forward and used as part of detailed site considerations for the proposed allocated sites.

## **Strategic Sites Masterplanning and Infrastructure Study: Flood Risk Technical Note**

- 6.236 This work has been an integral piece of evidence for the masterplanning work which has been undertaken for Paddock Wood/Land East of Capel. JBA who undertook the Stages 1 and 2 SFRA for the Council has also formed part of the masterplanning team for land around Paddock Wood, and have provided further technical evidence to inform the masterplanning approach. This is appended to the Strategic Sites Masterplanning and Infrastructure Study 2021. Further information is provided on this in the Strategic Sites Topic Paper.
- 6.237 It can be seen that regard to flood risk is a key consideration for the development provisions of the Local Plan. It will be a key issue going forward; hence, the Local Plan will also include a specific Flood Risk policy that requires that proposals for new development to contribute to an overall flood risk reduction, and only permit development where it would not be at an unacceptable risk of flooding on the site itself, and there would be no increase to flood risk elsewhere in accordance with the Sequential Test and Exception Test.

## L. Further consideration of infrastructure provision

- 6.238 The Issues and Options Consultation Document included the following questions:
- Question 6c: Have we identified the main infrastructure issues facing the borough?  
and
- Question 6d: If No, what infrastructure issues do you think are missing?
- 6.239 The Council's initial response in the Consultation Document. was: *"The Council recognises that infrastructure provision and need is a critical issue highlighted across responses to the consultation. The responses identify issues and concerns regarding various forms of infrastructure including social/community, physical and green infrastructure. The Council will continue to positively engage with all relevant infrastructure authorities and agencies, having an ongoing relationship, in order to prepare a comprehensive infrastructure delivery plan which will sit alongside the new Local Plan as part of its delivery. Where sites are allocated for development the relevant policies will identify the necessary infrastructure that needs to be secured and put in place."*
- 6.240 The Local Plan places the delivery of infrastructure, both improvements to existing and provision of new, as a key component of its development strategy as prioritised within Strategic Objective 5 – "To achieve the delivery of all forms of infrastructure that meets the needs of development and supports the vitality of communities". Strategic Policy STR5 – Infrastructure and Connectivity reinforces this objective through setting out the approach to the provision of infrastructure delivery, setting out the requirement for new infrastructure to support proposed development, and how it will be delivered. Additionally, Strategic Policy STR6 – Transport and Parking refers to the approach to key transport infrastructure and the priorities for sustainable transport modes.
- 6.241 An Infrastructure Delivery Plan (IDP) has been prepared and will be published alongside the Local Plan, which identifies all infrastructure requirements identified as a result of the new development proposals. Extensive consultation has taken place with service providers throughout the preparation of the Local Plan to identify and determine any new infrastructure required as a result of the development proposed. This has been an iterative process and the IDP reflects these discussions. The IDP Schedule sets out in detail the projects identified, costings where known, any identified funding, as well as the broad timescales for delivery, lead agencies and any funding gaps.
- 6.242 It is re-iterated that the IDP reflects a 'snapshot' in time and that infrastructure requirements, funding arrangements etc are subject to change and that the IDP should be regularly reviewed and updated. For this reason, it is termed a 'Live Draft' as by its nature it requires to be constantly updated to ensure it has the most up to date information and requirements in it to support the growth proposed in the Local



Plan. It is intended that the IDP will enable the service providers to target areas of need and support the level of growth set out within the Plan in collaboration with the Borough Council.

- 6.243 For those areas of significant growth at land at Capel and Paddock Wood, there will be strategically planned infrastructure delivered as part of the masterplanning approach to delivering development. It is recognised that significant infrastructure provision is a key element of the proposed development and is necessary in order to deliver the developments in a sustainable way. Alongside the IDP, a Strategic Sites Masterplanning and Infrastructure Study 2021 has been prepared in relation to the two Strategic Sites proposed at Paddock Wood and east Capel, and Tudeley Village detailing the infrastructure that is required to support the development proposed in this area. This should be read in conjunction with the IDP.

## 7.0 Summary and conclusions for the development strategy

- 7.1 The Local Plan has been prepared within the context of national planning policy, as set out in the NPPF (2019), which expects (at paragraph 11) that local plans meet the identified needs for housing and other uses in their area in full, as well as any needs that cannot be met in neighbouring areas, unless there are strong planning reasons why this is not possible, which may include regard to protected areas and assets, such as AONBs and Green Belts.
- 7.2 The local housing need for the borough are set out in the Housing Needs Assessment Topic Paper. This is found to be 678 dwellings per year (pa), or some 12,200 over the plan period of 2020, to 2038. In accordance with the NPPF, this is the minimum target. In terms of housing needs of neighbouring authorities, Sevenoaks District Council has sought help in meeting a need for some 1,900 dwellings that it has not found able to be met in its borough. While there is currently uncertainty as to this figure, it is nonetheless considered that the Council should assess its potential to provide for a higher level of growth.
- 7.3 At the same time, in view of the AONB and Green Belt designations which will inevitably be impacted by the scale of local development needs alone, approaches have been made to neighbouring councils as to their potential to increase housing and employment land provision, to reduce the pressure on these designation in the borough. However, none has identified any capacity to assist. Therefore, the Council is obliged to further investigate the potential for 'major developments' in the AONB and the release of land from the Green Belt. However, as noted above, the development needs are not requirements, although they are important factors in making judgements in line with the NPPF's policies.
- 7.4 A review of planning permissions at the base date of the Local Plan identifies a total of 3,313 dwellings. There are also a further 276 dwellings on sites that are identified in the existing Site Allocations Local Plan 2016 (SALP), but which have not yet been implemented. However, as part of the assessment work informing the Pre-Submission Local Plan, the capacities on some of these sites have been reviewed and amended (or the site removed) where a higher or lower capacity is considered to be more suitable. There has also been further review of the capacity of some sites allocated in the SALP already with extant planning permission where the permission only relates to a part of the site. Details of these are contained in the Housing Supply and Trajectory Topic Paper and the 2019/20 Five-Year Housing Land Supply Statement. These 6 sites are mainly within the main urban area (5 in Royal Tunbridge Wells, and 1 in Southborough).
- 7.5 As set out in Section 6E above, making effective use of urban land, especially brownfield land, is recognised as being a key part of the development strategy for the borough, firstly because such opportunities, while tending to be more difficult to

individually identify, make a significant contribution to overall supply and, secondly, because they take the pressure off greenfield land releases, including in sensitive areas. The Brownfield and Urban Land Topic Paper concludes that these 'windfall' (i.e. non-allocated) sites can be expected to deliver some 1,670 dwellings over the Plan period.

- 7.6 Hence, the Local Plan is looking, as a minimum at the potential to deliver some 6,900 further dwellings from new housing allocations (assuming that all previous allocations are still suitable and developable).
- 7.7 The options in terms of the overall distribution of development are considered, which leads to the conclusion that strategic sites are needed if the local housing need is to be met in full. Alternatives for these are then appraised, which leads to further investigation of the potentials for both the transformational growth of Paddock Wood and for a new settlement between Paddock Wood and Tonbridge, west of Five Oak Green.
- 7.8 Across the borough, several hundred potential development sites, including all those submitted during "calls for sites", have been considered in total. These are all reviewed in the Strategic Housing and Economic Land Availability Assessment (SHELAA).
- 7.9 Given that nearly 70% of the borough lies within the High Weald Area of Outstanding Natural Beauty (AONB), including a number of settlements with varying levels of services and facilities, it follows that some development is proposed there. In line with both national policy and the characteristics of the High Weald, most developments are small scale. However, some, larger developments are also found to be capable of being satisfactorily accommodated and of meeting the exceptional circumstances tests. These are discussed in Section 6H and the related appendices. Across the AONB, the allocations can still be seen to amount to limited development in both absolute and relative terms, as required by the NPPF.
- 7.10 The Metropolitan Green Belt is also a key designation, which serves a number of purposes regionally and locally. It extends from the western part of the borough around Royal Tunbridge Wells and up to the western edge of Paddock Wood. Maintaining the integrity of the Green Belt is a key objective and the justification for the proposed releases have been subject to several studies.
- 7.11 The most substantial removal of Green Belt status is proposed for the substantial expansion of Paddock Wood (including land at east Capel) and the creation of a new garden settlement at 'Tudeley Village'.
- 7.12 Broadly, Paddock Wood is a logical choice for strategic growth for a number of reasons; being an existing service and employment centre, having a central railway station and main road links, giving wider accessibility. It is also outside the AONB and, except for land to the west, beyond the Green Belt. It is notable that Paddock Wood is on the very outward edge of the Metropolitan Green Belt and is not a inset town. One of the main purposes of the Green Belt land here is to prevent neighbouring towns from merging into one another and the Green Belt Study shows

that whilst the cumulative release of land at Paddock Wood and for Tudeley Garden Village “will significantly weaken the Green Belt separation between Tudeley Village and Paddock Wood, the remaining Green Belt land will continue to play a strategic role in preventing these neighbouring ‘towns’ merging”.

- 7.13 The creation of Tudeley Village would involve the loss of a large area of Green Belt, but is well located in terms of accessibility to nearby towns, would be of a scale that supports a good range of services, and can be planned in a holistic, comprehensive manner, achieving very high standards of sustainable design and development. Whilst the release of Green Belt for Tudeley Village will weaken the extent to which remaining Green Belt land, particularly between Tudeley Village and Five Oak Green contribute towards some of the purposes, the masterplanning approach set out in the allocation policy and a wider land ownership offer significant opportunities to mitigate the Green Belt harm and to strengthen the remaining Green Belt. Moreover, no sustainable option outside the Green Belt has been identified, while it is found that development of such a strategic scale would be wholly incompatible with national AONB policy, as well as the character of the High Weald. Furthermore, without this new settlement, it is evident that the borough’s housing need would not reasonably be capable of being met.
- 7.14 The development potential around Royal Tunbridge Wells is also examined, but is found, in most part, to be doubly constrained by High Weald AONB and Green Belt designations. Nevertheless, capacity is identified for a significant level of growth, notably within the existing urban area, but also with some medium-sized fringe sites. In addition, a major business site is proposed on land adjoining the existing Longfield Road Employment Area.
- 7.15 Within the AONB settlements, the scale of growth is limited, being notably reduced as compared to the Draft Local Plan, especially at Cranbrook and Hawkhurst, where earlier draft proposals were acknowledged as representing more significant growth and, following further work in terms of their impacts on AONB landscapes and character, would not be justified.
- 7.16 More generally, the concerns expressed at the Draft local Plan stage about unduly and disproportionately large scales of growth at smaller villages, especially Sissinghurst, Matfield, and Hartley has been addressed by the refined strategy.
- 7.17 The Council has also been very mindful of the real concerns about the availability of infrastructure to support growth, the particular issues of flood risk in some areas, as well as the wider regard to climate change objectives. These matters have all been considered in the formulation and refinement of the development strategy.

## 8.0 Delivering the Proposed Development Strategy

- 8.1 The development strategy has been based on a thorough assessment of the availability, suitability, and deliverability of sites capable of contributing towards the development needs of the borough over the plan period together with key considerations.
- 8.2 As noted in the previous section, provision of necessary infrastructure has been a key consideration. A strategic policy on 'infrastructure and connectivity' is set out prominently in the Local Plan, supported by detailed policies on specific forms of infrastructure, including green infrastructure, digital communications, transport, local shops and services, sports and recreation provision. Furthermore, the strategic or 'parish strategy' policies for each parish/settlement include sections highlighting the infrastructure to be provided or contributed towards by development in that area. Individual site allocations provide further information on these requirements.
- 8.3 Details of the infrastructure anticipated over the plan period to support the planned growth is set out in the 'Infrastructure Delivery Plan' supporting document.
- 8.4 In terms of housing delivery, the sum of existing permitted developments, the allowance for windfall sites and the proposed allocations provides some 8.6% above the minimum local housing need. This is considered to be a useful "buffer" to ensure that the Local Plan requirement is still met in the event of potential delays in the build out of identified sites for reasons that may not be currently known. If build out rates are as forecast, as set out in the Housing Supply and Trajectory Topic Paper, then any further supply would further contribute to meeting identified housing needs.

# Appendices

# Appendix 1: Assessment of Green Belt sites

Table 6 – Assessment of Green Belt Sites

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
<b>AL/RTW 5</b> (RTW XX) <b>Land to the north of Caenwood Farm, Speldhurst Road</b>	Residential	5.611	0.079	SO1a	Moderate	Relatively Strong	Moderate	Relatively Weak	Negligible	Low- Moderate	
<b>AL/RTW 9</b> <b>Land at Beechwood Sacred Heart School</b>	Retirement housing C2	0	0	Not assessed as no Green Belt removed							SALP site. Planning approval granted

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
<b>AL/RTW 14</b> (RTW 16) <b>Land at Wyevale Garden Centre, Eridge Road</b>	Expansion of the existing Use Class E (a) commercial use (garden centre) with an element of residential	5.521	0.077	BA8/ TW11	Moderate	None	Relatively Strong	Relatively Weak	Negligible	Low-Moderate	
<b>AL/RTW 16</b> (RTW 18) <b>Land to west Eridge Road at Spratsbrook Farm</b>	Residential	6.332	0.089	BA7/ TW10	Moderate	None	Moderate	Moderate	Negligible	Low-Moderate	



Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
<b>AL/RTW 17</b> (RTW12) <b>Land adj to Longfield Road</b>	Employment uses	20.235	0.284	BA2/ TW4	Relatively Strong	Weak	Relatively Strong	Relatively Weak	Negligible	Moderate	Permission granted subject to S106 agreement)
<b>AL/RTW 19</b> (RTW 23) <b>Land to north of Hawkenbury Recreation Grd</b>	Recreation	7.071	0.099	BA6/ TW6a	Moderate	None	Moderate	Moderate	Minor	Moderate	Extant permission
<b>RTW Safeguarded land.</b> (RTW 13) <b>Land at Colebrook House</b>	Safeguarded for future employment uses.	9.292	0.130	BA2/ TW4	Relatively Strong	Weak	Relatively Strong	Relatively Weak	Negligible	Moderate	

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
AL/SO 2 Land at Mabledon House	Re- development of listed building and historic park & garden to provide hotel, leisure and conference facilities	0	0	Not assessed as no Green Belt removed							

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
<b>STR/SS 1</b> (CA 3/PW 1) <b>Paddock Wood including land at east Capel</b>	Urban expansion – mixed use including residential, schools, community facilities and employment land.	148.194	2.077	BA3 & BA4/ PW1	None	Relatively Weak	Strong	None	Moderate	High	
<b>STR/SS 3</b> (CA 1) <b>Tudeley Village</b>	New garden settlement to include residential, schools, community facilities and employment land.	182.994	2.565	BA3 & BA4	None	Relatively Weak	Strong	None	Moderate	High	

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
<b>AL/PE 1</b> <b>Land rear High Street/west of Chalket Lane (Includes AL/PE7)</b>	Residential and additional parking for Village hall.	7.603	0.107	BA6/ PE1	Relatively Weak	Weak	Relatively Weak	Relatively Weak	Negligible	Low	
<b>AL/PE 2</b> <b>Land at Hubbles Farm/south of Hastings Road</b>	Residential; safeguarding cemetery expansion	4.653	0.065	BA6/ PE1	Relatively Weak	Weak	Relatively Weak	Relatively Weak	Negligible	Low	
<b>AL/PE 3</b> <b>Land north A21/south &amp; west of Hastings Road</b>	Residential	5.463	0.077	BA6/ PE1	Relatively Weak	Weak	Relatively Weak	Relatively Weak	Negligible	Low	

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
<b>AL/PE4</b> <b>Land at Downingbury Farm, Maidstone Road</b>	Residential; safeguarding for medical expansion	4.679	0.066	BA2/ PE5	Moderate	Weak	Moderate	Weak	Negligible	Low-Moderate	
<b>AL/PE 5</b> <b>Land at Sturgeons fronting Henwood Green Road</b>	Residential	0.049	0.001	PE3	Weak	None	Weak	None	Negligible	Very Low	Extant consent
<b>AL/PE 7</b> <b>Cornford Court, Cornford Lane</b>  <b>Consented</b>	Integrated community health care facility	Included in AL/PE 1		Assessed under AL/PE 1							Extant consent

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
AL/PE 8 Owlsnest, Tonbridge Road  Consented	Care home facility	0	0	Not assessed as no Green Belt removed							Extant consent
AL/SP 1 Land west of Speldhurst Road/south of Ferbies	Residential	0.964	0.014	SP1	None	None	Very Weak	None	Negligible	Very Low	
AL/SP 2 Land adj Rusthall recreation ground	Recreation	0	0	Not assessed as no Green Belt removed							Extant consent

Site/Location (reference in Stage 3 GB study if applicable and different)	Type	Land removed from GB		Stage 2 GB Study: Broad area/ Parcel	Contribution to GB purposes 1 to 4 Purpose 1: checking the sprawl of the large built up area	Purpose 2: preventing neighbouring towns merging	Purpose 3: safeguarding the countryside from encroachment	Purpose 4: preserving the setting and special character of historic towns	Harm to remaining GB	Overall Harm from Release	Planning status where applicable.
		ha	%		1	2	3	4			
Note Green belt added south west of Paddock Wood	N/A	1.084	0.015								
Total Existing Green Belt	7,133.602 ha										
Total Green Belt removed	407.576 ha = 5.71%										

# Appendix 2: Assessing whether development is major in AONB terms

1. The four factors set out in NPPF footnote 55 to be considered in the determination of whether development is major are:
  - Nature of development
  - Scale
  - Setting
  - Significant adverse impact on AONB purposes
2. These are expanded upon, in the Tunbridge Wells High Weald AONB context below.
3. The methodology applied in this framework has been subject to discussion with, and broad agreement by, Natural England, notwithstanding that it is likely to have “in principle” objections to major developments in the AONB. In this context, it is important to stress that this framework is merely to help the Council decide which NPPF policies are relevant to a particular proposal. It is not a framework for determining whether a proposals development is acceptable in AONB terms. That is a separate process.

## Nature of development

4. Most proposed developments are wholly residential in nature, although there are some mixed use allocations and some purely employment use proposals, as well as individual medical and a hotel proposals. There are also a few ‘safeguarding’ proposals, where land is effectively reserved for potential future recreational or educational purposes. In these latter cases, the assessment assumes that the safeguarded use occurs.
5. All of these uses, with the possible exception of recreational proposals, are anticipated to substantially comprise built form, with the Council expecting a (policy-compliant) high quality of design. However, consideration is also given to the likely form of proposals; for example, if a residential scheme has any blocks of more than 2/3 storeys; if an employment development proposal is for reuse or new development; if it is for smaller workspaces or larger warehouse-type “sheds”; if a hotel scheme is to be set within extensive grounds and/or retain landscape features.
6. Landscape conservation and/or enhancement measures that are integral to a proposal will not normally be considered under this factor, but would be relevant to the assessment of impact on the AONB’s landscape and scenic beauty.



# Scale

7. 'Scale' is considered in both absolute and relative terms; that is, to both the actual size of the development and to the settlement to which it relates. Both measures are considered, as both are regarded as contributing to a person's perception of whether a development is 'major'.
8. Having regard to the landscape and settlement pattern of the High Weald AONB, any schemes involving 100+ dwellings, or 5 hectares of commercial use, would be viewed as 'very substantial', irrespective of its size to its local context. Therefore, and given the significance of absolute scale within the overall assessment, these will almost inevitably be major developments.
9. Smaller developments may also be classed as major, having regard to their relative scale (below) in conjunction with the other factors.
10. Relative scale is measured, if residential, by the number of dwellings anticipated in the development and those in the settlement (using property address point data) or, for other uses by the site area and area of the settlement (measured from the relevant Limits to Built Development).
11. The following banding is used as a guide in relation to relative scale:

Table 7: Banding as a guide in relation to relative scale

Scale	Scale relative to settlement	Implications
<b><i>Very substantial</i></b>	More than 15%	Almost certainly going to be 'major'
<b><i>Substantial</i></b>	10-15%	Very likely to be 'major' unless other factors more favourable
<b><i>Moderately substantial</i></b>	5-10%	Less likely to be 'major' unless negative against other factors
<b><i>Not substantial</i></b>		Less likely to be 'major' against this test (but may still be 'major' if substantial negative impact against other factors)

12. This banding does not imply an absolute mathematical relationship but is used to illustrate differences in relative scales. The bands are based on officers' experience of proposals within the High Weald AONB.

## Setting

13. 'Setting' commonly relates to the relationship of the site to its surroundings but in this case might also include aspects within the site itself. It normally relates to whether a site can be regarded as a natural extension of the main built-up area of a settlement, or whether it is more related to the countryside beyond a settlement. Hence, considerations include the existing pattern of development, land uses, physical features and topography, as well as the form of development in the context of the character of its setting.
14. For example, a site that is situated between existing built-up parts of a settlement and its development would take a similar form so is less likely to be 'major', whereas a site physically separated from or otherwise poorly related to existing development is more likely to be treated as 'major'.
15. It is considered helpful to differentiate the relationship between sites/developments and their settings on a scale: Poorly related – Reasonably related – Well related

## AONB impact

16. This is typically dependent upon the presence and effect of development upon typical components of AONB character and/or key characteristic features of the local landscape. It may also consider visual matters such as degree of exposure/containment, prominence, contribution to views etc. and setting of components or features outside the site boundary.
17. Consideration would be given as to whether effects could be avoided through applying buffers or policy wording. For instance, an allocation may well include an area of ancient woodland but by excluding the ancient woodland from the developable area, applying an appropriate buffer and requiring the development to improve management of the woodland, negative effects can be largely avoided and positive contributions to the AONB management plan secured. In other words, regard is given to the impact that a policy-compliant development could have.
18. Assessment of the GIS layers for AONB components is underpinned by consideration of information and guidance set out for instance in the Borough Landscape Character Assessment Objectives and Historic Landscape Characterisation Study. These, and other environmental sensitivities identified above, are all identified on the Council's GIS system, which has been used to screen proposed sites and developments.
19. Where a significant adverse impact is considered likely to occur, then it would make a development much more likely to be treated as 'major'. While a major impact does not necessarily correlate with a 'major' development, harm to the landscape and scenic beauty of the AONB would weigh heavily against the acceptability of a development irrespective of whether the proposal is 'major' or not.
20. The degree of impact will depend on the degree to which character components are affected. This can be a clearly significant impact if a highly sensitive component,

such as Ancient Woodland, is directly affected or if an assemblage of components, such as medieval field pattern, historic farmstead, pond/woodland, would be compromised. A moderate impact can be where only few of the components are affected, while there would be little significant impact if there are only limited or indirect implications for the integrity of character components.

21. It is again considered helpful to view impact on AONB purposes on a scale:

Table 8: Impact on AONB purposes on a scale

<b>High impact</b>	Impacts on several AONB character components
<b>Moderate impact</b>	Impacts on some AONB character components
<b>Low impact</b>	Impacts on few if any AONB character components

## Forming a conclusion

22. The results of the respective assessments against each of the above NPPF considerations are drawn together by experienced planning officers in making a judgement on whether a development is major. While this is a matter of judgement, it is based on experience in the local context, while the above assessment framework provides a basis for ensuring consistency of approach with the NPPF, and to the treatment of sites in the Local Plan.
23. The consideration of AONB components in the table below is based upon the identified five components of natural beauty in the AONB Management Plan which are:
- Geology, Landform and Water Systems
  - Settlement
  - Routeways
  - Woodland
  - Field and Heath
24. For each component there are objectives within the AONB Management Plan and this is supported by a set of spatial data relevant to the objectives. The relevant spatial data listed below (with a useful objective reference from the AONB Management Plan) has been screened against each site to help assess the potential degree of interaction between the allocation and the components of natural beauty. It should be noted that this screening:
- Only picks up components that are on or form part of the site boundary
  - Identification of a component does not necessarily mean that there will be a direct or indirect impact on the component.

- The spatial data does not record the quality or condition of the component.

25. Any notable features relevant to AONB components not picked up by the spatial data but otherwise noted from other sources or observed by officers has also been noted.

#### Geology, Landform and Water Systems

- G1 Reservoirs
- G1 Ponds
- G1 Open water
- G1 Watercourses
- G2 Outcrops (sandstone outcrops)
- G2 Geo (sandstone geology – this records underlying geology)

#### Settlement

- S2 Settlements (Historic settlement)
- S2 Farmstead (Historic farmstead)

#### Routeways

- R1 Roads (Historic routeways that are now roads)
- R1 PROW (Historic routeways that are Public Rights of Way – PROW)

#### Woodland

- W1 Ancient Woodland

#### Field and Heath

- FH2 Historic Fields (where relevant additional information from the Historic Landscape Characterisation has been added)
- FH2 Heathland
- FH3 Meadows (Wildflower Meadows)

# Appendix 3: Assessing whether AONB sites are major

## SECTION 1 Methodology and Tables

For full methodology refer to **Appendix 2** of the **Distribution of Development Topic Paper**. This section provides additional details of the method used for relative scale.

To determine relative scale for residential use in the **villages** where sites are adjacent or close to the LBD the methodology takes the maximum number of dwellings anticipated for the proposed site and expresses it as a percentage of the existing dwellings (using property address point data) within what is considered to be the settlement boundary i.e. the area and properties that people would normally consider to be part of the settlement which typically extends slightly beyond the Limits to Built Development (LBD). For transparency the 'settlement boundaries' used for this exercise are set out in Section 2.

In the case of allocations for dwellings and other development proposed away from an LBD or adjacent to the main urban area of RTW a judgement is made based on the scale of the proposal in relation to the surrounding built environment. Where sites are in close proximity to each other consideration has been given to any likely cumulative effect.

**TABLE 9: Figures for relative scale using available data as of November 2019:**

	<b>Area of Settlement Boundary (Ha)</b>	<b>Number of properties within Settlement Boundary</b>
Cranbrook	198.9296	1749
Hawkhurst	221.78	1779
Benenden	53.35608	298
Matfield	67.01321	306
Goudhurst	49.88311	499
Lamberhurst	120.6834	461
Pembury	219.5935	2384
Sandhurst	38.76839	320
Speldhurst	62.84208	402

**TABLE 10: Assessment of sites proposed to be allocated in the High Weald AONB against the requirements of paragraph 172 of the NPPF and footnote 55 to determine whether sites are considered ‘major’ or not ‘major’**

<b>Site policy reference and site address in the PSLP</b>  (Site Policy reference used for Reg. 18)	<b>Settlement / Parish</b>	<b>Nature of development</b>	<b>Scale</b> Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	<b>Setting</b> Poorly related/ Reasonably related/ Well related	<b>AONB</b> component parts present	<b>Impact</b> High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	<b>Conclusion and Notes for further consideration</b>
<b>Royal Tunbridge Wells</b>							
AL/RTW 16 Land to the west of Eridge Road at Spratsbrook Farm (RTW 16)	Royal Tunbridge Wells	Residential: Allocated for 120 dwellings with more than 50% of the site allocated as open space to protect sensitive landscape features.	Very substantial (as more than 100 dwellings).	Reasonably related.	R1 Road G2 Geo Also nearby/adjacent R1 PROW G1 Ponds G2 Outcrops W2 Ancient woodland S2 Farmstead FH2 Historic Fields – HLC medieval assart.	Moderate Impact  Large scale development in sensitive landscape. Heritage assets including archaeology and topography likely to be affected but developable area is arable with few features.  Site exhibits some urban fringe issues and part has poor edge of settlement. Strong landscape structure of containment.  Ancient woodland to be protected and enhanced and well away from developable area.	<b>Major</b>  Less than half of site to be developed remainder protected as semi natural green space with scope for significant landscape enhancements.  Whilst there are few landscape features of limited interest on the developable area the context is very sensitive and so

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
						LVIA Conclusion: High harm (western part not developed) Medium/Low (eastern part to be developed).	development is judged to be major.  Structural landscape can be reinforced to provide strong edge of settlement. Good connectivity to town and wider landscape.
AL/RTW 17 Land adjacent to Longfield Road (RTW12)  <b>Permission granted</b>	Royal Tunbridge Wells	Allocated for 80,000sqm of employment space with a large landscape buffer to the north.	Very Substantial 37ha (as more than 5ha)	Reasonably related	R1 PROW G1 Ponds G1 Watercourse, G2 Geo W2 Ancient Woodland FH2 Historic Fields, HLC – late post medieval	High Impact  Large scale development with large scale buildings in elevated location on the edge of RTW with AONB features and undulating topography.  Site is adjacent to existing industrial development exhibits some urban fringe issues and is used for travelling fairs and boot fairs. Adjacent to landscape/ecological	<b>Major</b>  Very large site on the edge of settlement close to ridge. Although significant changes in topography are expected boundary features to be retained.  Significant

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
						mitigation for A21dualling works.  Ancient woodland to be protected and enhanced.  LVIA Conclusion: Medium/Low harm	landscape and ecological mitigation area to the north close to PROW. Policy to control building heights.  One of very few sites close to existing industrial area of RTW that can provide the required economic land and meets the requirements of one of the largest employers in RTW.
AL/RTW 19 Land to the north of Hawkenbury Recreation Ground (RTW 23)  <b>Extant Consent</b>	Royal Tunbridge Wells	Recreation - new and enhanced sport and recreation provision as part of a new	Substantial 7.1ha (although more than 5ha use is primarily open	Reasonably related	R1 PROW/ Road G1 watercourse G2 Geo W2 Ancient woodland FH2 Historic	Moderate Impact  Site is between open countryside and existing recreation area and has strong defensible boundaries. Proposal is for mostly grass	<b>Not Major</b>  Although the policy does allow for built elements the primary use is recreational and



Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
		stadia sports hub, to include standing/seating for supporters, other ancillary structures, and increased parking provision.	space)		Fields – HLC Assart overlaid by 20C changes	<p>pitches but there are some significant elements of built development.</p> <p>Field boundaries retained and ancient woodland buffered.</p> <p>LVIA Conclusion: Medium/Low harm</p>	<p>the site is strongly associated with existing recreational uses and well defined site boundaries.</p> <p>Hedgerows and woodland will be retained and protected. And the site is well connected for vehicles and pedestrians.</p>
<p><b>Cumulative scale of development at Royal Tunbridge Wells:</b></p> <p>Unlikely owing to scale of existing settlement and because the proposed developments are</p>							

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
some distance apart from each other.							
<b>Southborough</b>							
AL/SO 2 Land at Mabledon House (SO 4)	Southborough Parish	Allocation for hotel and conference facility.  The allocation contains extensive historic parkland which is to be protected and enhanced through the policy. The site also remains within the Green Belt.	Moderately substantial (Re-development and enabling development centred on heritage assets)	Reasonably related (Although site is not attached to a recognised settlement the development proposed is in keeping with the nature of the site and contained within a developed area)	G1 Water Courses G1 Ponds G2 Geo W2 Ancient Woodland Historic Park and Garden with listed buildings and quarry.	Low/ Moderate Impact  House and Parkland are in decline. Site contains a number of modern buildings and unsympathetic development. Redevelopment provides and opportunity to restore landscape and heritage features and the wider parkland in particular.  New development is constrained to a limited area.  LVIA Conclusion: Medium harm	<b>Not Major</b>  Development to focus on existing buildings and also likely to result in improvements to existing heritage assets. Policy wording ensures development is restrained.  Both listed landscape and building are potentially at risk and would benefit from new investment.  Appropriate

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
							landscape management can be secured through any consent.
<b>Cumulative scale of development at Southborough:</b>  None - there are no other proposed developments in the vicinity.							
<b>Cranbrook and Sissinghurst</b>							
AL/CRS 1 Land at Brick Kiln Farm (part of CRS 9)  <b>Extant Consent</b>	Cranbrook	Residential: 180 dwellings with significant landscape buffers and enhancements	Substantial (1749 dwellings in settlement. 180 = 10.29%)	Well related	R1 Road and PROW G1 Water Courses G1 Ponds G2 Geo S2 FarmsteadsS2 SettlementsW2 Ancient Woodland FH2	High  Previously allocated in SALP. LVIA not required as carried out as part of outline consent.	<b>Major</b> - allocated under SALP as a single site with CRS 2  Was allocated under SALP and now has consent.

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
					Historic Field HLC - early post medieval, 20C and 21C		
AL/CRS 2 Land south of Corn Hall, Crane Valley (part of CRS 9)	Cranbrook	Residential: 35-45 dwellings with significant landscape buffers and enhancements	Not substantial (1749 dwellings in settlement. 45 = 2.57%)	Well related	R1 Road and PROW G1 Water Courses G1 Ponds G2 Geo S2 FarmsteadsS2 SettlementsW2 Ancient Woodland FH2 Historic Field HLC - early post medieval, 20C and 21C	Moderate  Previously allocated in SALP.  LVIA not required as already assessed as part of SALP	<b>Not Major</b> on its own but cumulatively with CRS1 <b>Major</b>  Was allocated under SALP with CRS 1
AL/CRS 3 Turnden Farm, Hartley Road (CRS 4)  <b>Resolution to grant consent (awaiting S106 and SoS call in procedure)</b>	Cranbrook	Residential: 200-204 (164-168 new additional) with significant landscape buffers and enhancements	Very substantial (as more than 100 dwellings) (1749 dwellings in settlement 204= 11.66%)	Reasonably well related	R1 Road and PROW G1 Water Courses G1 Ponds G2 Geo S2 FarmsteadsS2 SettlementsW2 Ancient Woodland FH2 Historic Field	High  Location between Cranbrook and Hartley makes size a more significant factor. In a sensitive area between Cranbrook and Hartley but areas proposed for built development in allocation take account of this. Will require a	<b>Major</b>  Historical equestrian use and recent development has left the land with no clear function and is not being actively put to

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
					HLC - early post medieval, 20C and 21C	<p>sensitive scheme to minimise effects on landscape and heritage assets.</p> <p>Only that part of the site closest to existing development at Cranbrook to be developed.</p> <p>Land between Hartley and proposed development to be retained as open space/agriculture. Structural landscape features to be retained and enhanced with historic tree lines and hedgerows restored. Improvements to existing water course and ancient woodland protected. .</p> <p>LVIA Conclusion: Medium/Low harm</p>	<p>agriculture. Development provides an opportunity to resolve land use issues and to provide a green and permanent gap between Hartley and Cranbrook that builds on and relates well to other recent development.</p> <p>Potential to extend Crane valley LNR/green infrastructure.</p>
AL/CRS 4 Cranbrook School (CRS 10)	Cranbrook	No specific development proposed. Policy	Not applicable	Well related	R1 PROW G1 Ponds G1 Water Courses G2 Geo S2	<b>Not applicable</b>	<p><b>Not Applicable</b></p> <p>The purpose of the policy is to</p>

<b>Site policy reference and site address in the PSLP</b>  (Site Policy reference used for Reg. 18)	<b>Settlement / Parish</b>	<b>Nature of development</b>	<b>Scale</b> Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	<b>Setting</b> Poorly related/ Reasonably related/ Well related	<b>AONB</b> component parts present	<b>Impact</b> High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	<b>Conclusion and Notes for further consideration</b>
		recognises potential for wider site to deliver educational & community facilities. Requirement for an overall masterplan approach to preclude sporadic development within wider landholding			Settlements		provide guidance on and to control development that may come forward but there is no proposed development within the policy
<b>Cumulative scale of development at Cranbrook:</b>  CRS 1, 2 and 3: 1749 dwellings in settlement = 429 dwellings 24.52%) CRS 3 alone							

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
(excludes extant permissions and SALP sites) = 204 dwellings (11.66%)							
<b>Hawkhurst</b>							
AL/HA 1 Land at the White House, Highgate Hill (HA 2)  <b>Extant Consent</b>	Hawkhurst Highgate	Residential: 43 retirement living apartments	Not substantial (1779 dwellings in settlement 43 = 2.41%)	Well related	G2 Geo S2 SettlementFH2 Historic Fields	Low  Land is predominantly previously developed as part of a residential property and garden surrounded by built development.  Not included in LVIA work as not considered major at the time.	<b>Major</b>  AONB: Recent planning consent considered development to be major.
AL/HA 2 Brook House, Cranbrook Road (HA 5)  <b>Extant Consent</b>	Hawkhurst Highgate	Residential: 25 apartments	Not substantial (1779 dwellings in settlement 25 = 1.41%)	Well related	Screening not recorded as previously allocated/partially previously developed.	Low  Allocated site	<b>Not Major</b>
AL/HA 3 Former site of Springfield Nurseries	Hawkhurst Highgate	Residential: 24 dwellings	Not substantial (1779 dwellings in	Well related	Screening not recorded as previously allocated /	Low  Allocated site	<b>Not Major</b>

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
<b>Extant Consent</b>			settlement 25 = 1.35%)		partially previously developed.		
AL/HA 4 Land off Copthall Avenue and Highgate Hill (HA 6)	Hawkhurst Highgate	Residential 70-79 dwellings with significant area of open space /landscape enhancement.	Not Substantial (1779 dwellings in settlement 79 = 4.44%)	Reasonably related	G1 water Course G1 Ponds G2 Geo S2 Settlement FH2 Historic fields - HLC early post medieval and Early 20C PROW adjacent	Moderate  Location in the valley between Highgate and the Moor is a determining factor as are the presence of sensitive features.  Includes areas of previously developed and/or disturbed land. Development contained on the western side closest to existing development  LVIA Conclusion: Medium/Low harm	<b>Major</b>  Development should result in improvements to existing poor edge of settlement and improved connectivity to rural landscape.  Development has the potential to be well integrated with existing settlement and to demonstrate a landscape led approach with appropriate AONB design response, green space provision, landscape



Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
							protection and enhancements.
AL/HA 5 Land to the north of Birchfield Grove (Part of HA 4)	Hawkhurst The Moor	Medical centre and parking.	Not substantial 0.79 ha	Reasonably related	G2 Geo S2 SettlementFH2 Historic Fields  HLC – consolidated medieval field W2 Ancient woodland adjacent but not affected.	Low  Relatively small development that can be contained by landscaping.  Key landscape features can be retained and enhanced.	<b>Not Major</b>
AL/HA 6 King George V Playing Fields, The Moor (HA 7)	Hawkhurst The Moor	Re-development for community facility.	Not Substantial - No change in overall area	Reasonably related	Possibly part of the original Moor but became a recreation ground post WWII. AONB Components unlikely to be affected.	Low  Redevelopment of existing recreation/community facility	<b>Not Major</b>  No significant changes to character of area or landscape features.
<b>Cumulative scale of development at Hawkhurst:</b>							

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
HA 1, 2, 3 and 4: 1779 dwellings in settlement = 171 dwellings 9.6%) HA 4 alone (excludes extant permissions and community uses) = 79 = 4.44%							
<b>Gills Green</b>							
AL/HA 7 Hawkhurst Station Business Park (HA 8)  <b>Part extant consent.</b>	Hawkhurst Gills Green	Allocation for employment uses with large landscape buffer.	Substantial 2.14 ha Significant increase over existing site.	Reasonably related	G2 Geo HLC Part of cohesive assart field although field sub divided in modern times and some history of industrial use.	Moderate Impact  Adjoins and is accessed from an existing employment site and is well contained.  No AONB features within site other than field pattern (hedgerows retained).  LVIA Conclusion: Medium harm	<b>Not Major</b>  Although only 2.14 ha Gills Green is a small settlement and it would extend and consolidate development around Gills Green.  It will be seen in the context of the existing employment site

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
							as a natural extension onto land previously used in association with the railway yard and related economic development. Site is well contained and existing strong boundaries will be retained and protected.  Natural extension of existing employment land. Other opportunities for such provision are extremely limited.
AL/HA 8 Site at Limes Grove (March's Field) (HA 10)	Hawkhurst Gills Green	Safeguarded for employment use	Moderately substantial 0.63ha	Well related	G2 Geo 20th century field close to historic farmstead	Low	<b>Not Major</b> A small more discrete and well contained site

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
<b>Cumulative scale of development at Gills Green:</b>  HA 7 (2.14 ha) and HA 8 (0.63 ha) which in total are 2.77ha. The sites are separated by existing economic development but there may be a small cumulative effect in terms of the overall level of development at the settlement.							
<b>Benenden</b>							
AL/BE 1 Land adjacent to New Pond Road (known as Uphill) (BE 2)	Benenden	Residential: 18-20 dwellings	Moderately substantial (298 dwellings in settlement 20 = 6.7%)	Well related	S1 Settlement	Low	<b>Not major.</b> Site well related to village and development not particularly large. Also, low impact on AONB

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
							components.
AL/BE 2 Feoffee Cottages and land, Walkhurst Road (BE 3)  <b>Resolution to grant consent (awaiting S106)</b>	Benenden	Residential: 25 dwellings with substantial landscape buffer.	Moderately Substantial (298 dwellings in settlement 25 = 8.39%)	Well related	S1 Settlement S1 Farmstead FH2 Historic Field HLC Early post medieval field pattern adjacent to ancient woodland and historic farmstead.	Moderate	<b>Not major.</b>  Site well related to village and development not particularly large, albeit some impact on AONB components but large buffer to ancient woodland.
AL/BE 3 Land at Benenden Hospital (south of Goddards Green Road)  <b>Extant Consent</b>	Benenden East end	Residential: 22-25 residential units (in addition to the 23 new dwellings that have already been granted approval at this site),	N/A	N/A	HLC 20C fields	N/A  A very small part of the allocated area which is currently put to garden falls within the AONB	<b>Not assessed as outside AONB.</b>  Mostly previously developed. Issue of setting of the AONB considered elsewhere.
<b>Cumulative scale of development at Benenden:</b>							

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
BE 1, and 2: 298 dwellings in settlement = 45 dwellings (15.10%)							
<b>Brenchley and Matfield</b>							
AL/BM 1 Land between Brenchley Road, Coppers Lane and Maidstone Road (BM 1)  <b>Extant Consent</b>	Matfield	Residential: 45 dwellings	Substantial (306 dwellings in settlement 45 = 14.71%)	Reasonably related	G2 Geo S1 Settlements S1 Farmstead, FH2 Historic Fields  HLC Modern Field amalgama-tion	Moderate  Loss of some hedgerow for access but others can be protected. Arable field isolated from other agricultural activity with limited attributes. Provides open area and views within settlement.  LVIA Conclusion: Medium/Low harm	<b>Major</b>  Will be perceived as large development owing to context. Will alter settlement pattern. Most hedgerows to be retained and enhanced.  Well located in relation to village centre. Landscape structure and biodiversity can

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
							be improved.  Application of strong policy can provide modest development in sustainable location whilst retaining sense of place and views.
AL/BM 2 Land at Maidstone Road (BM 4)	Matfield	Allocation for 11-15 dwellings and additional car parking for village hall.	Not Substantial (306 dwellings in settlement 15 = 4.90%)	Well related	G2 Geo S2 Settlements  HLC late 20C	Low  Landscape much altered with no clear structure.	<b>Not Major</b>  Site well related to village and community facilities.
<b>Cumulative scale of development at Matfield:</b>  BM 1 and 2: 306 dwellings in settlement = 60 dwellings = 19.61%							
<b>Goudhurst</b>							

<b>Site policy reference and site address in the PSLP</b>  (Site Policy reference used for Reg. 18)	<b>Settlement / Parish</b>	<b>Nature of development</b>	<b>Scale</b> Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	<b>Setting</b> Poorly related/ Reasonably related/ Well related	<b>AONB</b> component parts present	<b>Impact</b> High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	<b>Conclusion and Notes for further consideration</b>
AL/GO 1 Land east of Balcombes Hill and adjacent to Tiddymotts Lane (GO 1)  <b>Extant Consent</b>	Goudhurst	Residential: 14 dwellings	Not substantial (499 dwellings in settlement 14 = 2.81%)	Well related	G1 Ponds G2 Geo S2 Settlement	Low  A well connected parcel of land mostly former garden area.	<b>Not Major</b>  Well related to development. Mostly former garden area. Boundaries retained.
AL/GO 2 Land at Triggs Farm, Cranbrook Road (GO 2)  <b>Extant Consent</b>	Goudhurst	Residential: 11 new dwellings	Not substantial (499 dwellings in settlement 11 = 2.20%)	Reasonably well related	G2 Sandstone S2 Historic Settlement FH2 Historic fields - HLC Early Post medieval field	Low	<b>Not Major</b>  (Determined at appeal to be not major.) <b>APP/M2270/W/18 /3196553</b>
<b>Cumulative scale of development at Goudhurst:</b>  GO 1 and 2: 499 dwellings in settlement = 25 dwellings = 5.01%)							
<b>Lamberhurst</b>							
AL/LA 1 Land to	Lamberhur	Residentila:	Moderately	Reasonably	R1 PROW	Moderate	<b>Not major</b>



Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
the west of Spray Hill (LA 1)	st	25-30 dwellings with significant green space	substantial (461 dwellings in settlement 30 = 6.51%)	related	G2 Geo S2 Historic Settlement 20C field patterns	Set within an area characterised by residential development and well contained.	Relatively small area to be developed for housing some of which is previously developed and is visually well contained. Large area of open space retained by development.
<b>Cumulative scale of development at Lamberhurst:</b>  None – no other development.							
<b>Pembury</b>							
AL/PE 1 Land rear of High Street and west of Chalket Lane (PE 1)	Pembury	Residential: 50-60 dwellings with significant green space and	Not substantial (2384 dwellings in settlement 60 = 2.52%)	Well related	G2 Geo FH2 Historic Fields HLC Medieval field affected by A21 – some 20C	Low  Strong relationship with existing development and is effectively an infill between development and the A21	<b>Not Major</b> on its own but cumulative with PE2 and PE3 <b>Major</b>

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
		landscape buffers	Note: adjacent to PE2 & 3 so consideration of cumulative effect required. Moderately substantial (2384 dwellings in settlement PE1, 2 and 3 = 220 = 9.22%)			Linear parcel of land acts as a buffer to A21 and provides a green edge to this part of Pembury.  LVIA Conclusion: Low harm	Strip of land left over after construction of A21 in sustainable location. Limited contribution to wider AONB landscape.  Opportunity to strengthen wooded buffer to A21 and retain this essential characteristic.  Issues around cumulative effects can be addressed through design. Offers opportunity for sustainable development whilst retaining green edge to Pembury.
AL/PE 2 Land at	Pembury	Residential:	Not	Well related	R1 PROW G2	Low	<b>Not Major</b> on its

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
Hubbles Farm and south of Hastings Road (PE 2)		80 dwellings and safeguarded land for cemetery. Significant landscape buffer.	substantial (2384 dwellings in settlement 80 = 3.36%) Note: adjacent to PE1 & 3 so consideration of cumulative effect required. Moderately substantial (2384 dwellings in settlement PE1, 2 and 3 = 220 = 9.22%)		Geo FH2 Historic Fields – HLC Early post medieval field affected by A21.	Strong relationship with existing development and is effectively an infill between development and the A21  Linear parcel of land acts as a buffer to A21 and provides a green edge to this part of Pembury.  LVIA Conclusion: Low harm	own but cumulative with PE1 and PE3 <b>Major</b> Strip of land left over after construction of A21 in sustainable location. Limited contribution to wider AONB landscape.  Opportunity to strengthen wooded buffer to A21 and retain this essential characteristic.  Issues around cumulative effects can be addressed through design. Offers opportunity for sustainable development

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
							whilst retaining green edge to Pembury.
AL/PE 3 Land north of the A21, south and west of Hastings Road (PE 3)	Pembury	Residential: 80 dwellings and significant landscape buffer.	Not substantial (2384 dwellings in settlement 80 = 3.36%) Note: adjacent to PE1& 2 so consideration of cumulative effect required. Moderately substantial (2384 dwellings in settlement PE1, 2 and 3 = 220 = 9.22%)	Well related	R1 PROW G2 Geo W2 Ancient woodland FH2 Historic Fields – early post medieval cut through by A21.	Low  Strong relationship with existing development and is effectively an infill between development and the A21  Linear parcel of land acts as a buffer to A21 and provides a green edge to this part of Pembury.  LVIA Conclusion: Low harm	<b>Not Major</b> on its own but cumulative with PE1 and PE2 <b>Major</b> Strip of land left over after construction of A21 in sustainable location. Limited contribution to wider AONB landscape.  Opportunity to strengthen wooded buffer to A21 and retain this essential characteristic.  Issues around cumulative effects can be addressed

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
							through design. Offers opportunity for sustainable development whilst retaining green edge to Pembury.
AL/PE 4 Land at Downingbury Farm, Maidstone Road (PE 4)	Pembury	Residential: 25 dwellings with land safeguarded for Hospice expansion.	Not substantial (2384 dwellings in settlement 25 = 1.05% + safe-guarded land)	Reasonably related	R1 PROW G2 Geo S2 Farmstead W2 Ancient Woodland adjacent. HLC Fields 20C	Low  Small site on edge of settlement in gap to Pembury Bypass. Limited effect on AONB features	<b>Not Major</b> Limited development proposed and area already affected by modern development including bypass.
Al/pe 6 woodsgate corner, pembury (pe 7)  <b>Extant consent (NB: for different development type).</b>	Pembury	Specialist housing for older people - provides for up to 80 units for extra care) or up to 120 units of residential care home/nursing	Not Substantial (largely previously developed/ extant consent. (2384 dwellings in settlement 120 =	Well related	R1 Roads G2 Geo	Low  Existing supermarket with extant consent for expansion and Park and ride facility	<b>Not Major</b> Existing allocation with extant permission. Assessment based on changes as a result likely effects of new policy which in AONB and contextual terms

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
		care.	5.03%)				are not considered significant.
AL/PE 7 Cornford Court, Cornford Lane  <b>Extant Consent</b>		Allocated for a 68-suite integrated community healthcare facility, including the provision of an integrated Community Day Care Centre.	Not Substantial (largely previously developed/ extant consent. (2384 dwellings in settlement 68 = 2.85%)	Well related	R1 Roads G2 Geo	Low  Redevelopment of residential property and garden. Contained by tree belt	<b>Not Major</b>  Well related to existing development and previously developed land. Landscape boundaries can be enhanced.
<b>Cumulative scale of development at Pembury:</b>  PE 1, 2 and 3: are closely linked and could have a cumulative effect - 2384 dwellings in settlement PE1, 2 and 3 =							

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
220 = 9.22% All sites taken together - 2384 dwellings in settlement PE1 to 7 = 452 = 18.96% (Includes PE 5 (19 Units) which is inside the LBD and outside the AONB) PE 1 to 4 (excludes extant permissions) = 245 = 10.28%)							
<b>Sandhurst</b>							
AL/SA 1 Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane (SA 1)	Sandhurst	Residential: 10-15 dwellings	Not substantial (320 dwellings in settlement 15 = 4.69%)	Well Related	R1 PROW G2 Geo FH2 Historic Field HLC early post medieval (compromised by modern development)	Low  A small site closely associated with existing development. Existing open aspect to south can be contained by new landscaping.	<b>Not Major</b>  Site is small and well related.
AL/SA 2 Sharps Hill Farm, Queen Street	Sandhurst	Residential: 10-15 dwellings	Not substantial (320	Well Related	G1 Ponds and Water courses	Low  We contained and defined land	<b>No major</b>  Partly previously

Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
			dwelling in settlement 15 = 4.69%)		G2 Geo S2 Historic Settlement	parcel but very mixed character within in poor condition.  LVIA Conclusion: Low harm	developed and well related to existing settlement. AONB components are retained and protected by policy.
<b>Cumulative scale of development at Sandhurst:</b>  SA 1 and SA2 320 dwellings in settlement 30 = 9.38%)							
<b>Speldhurst</b>							
AL/SP 1 Land to the west of Langton Road and south of Ferbies (SP1)	Speldhurst	Residential: 10-12 dwellings	Not substantial (402 dwellings in settlement 12 = 2.99%)	Reasonably related	S2 Settlement G2 Geo FH2 Historic Field – HLC early post medieval – remnant of land associated with 20C	Low  Remnant land parcel on edge of settlement and routeway. Strong boundary features retained.	<b>Not Major</b>  Relatively small development that is well related and contained by a strong landscape framework.



Site policy reference and site address in the PSLP  (Site Policy reference used for Reg. 18)	Settlement / Parish	Nature of development	Scale Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	Setting Poorly related/ Reasonably related/ Well related	AONB component parts present	Impact High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	Conclusion and Notes for further consideration
					development to the north.		
AL/SP 2 Land at and adjacent to Rusthall Recreation Ground, Southwood Road (SP 2)	Langton Green	Allocated for recreation and sports provision, including additional provision for a range of sports and recreation uses, including grass and 3G sports pitches, and new and or enhanced built facilities such as male and female changing rooms.	N/A	Well related	Low	G2 Geo FH2 Historic Field – HLC early post medieval	<b>Not Major</b> Land safeguarded for future development potential including sports pitches.
<b>Cumulative scale of</b>							

<b>Site policy reference and site address in the PSLP</b>	<b>Settlement / Parish</b>	<b>Nature of development</b>	<b>Scale</b> Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	<b>Setting</b> Poorly related/ Reasonably related/ Well related	<b>AONB</b> component parts present	<b>Impact</b> High/Moderate/Low  Taking account of effects on AONB Components, possible cumulative effects and where available the LVIA.	<b>Conclusion and Notes for further consideration</b>
<b>development at Speldhurst:</b>  None – no other housing development nearby.							

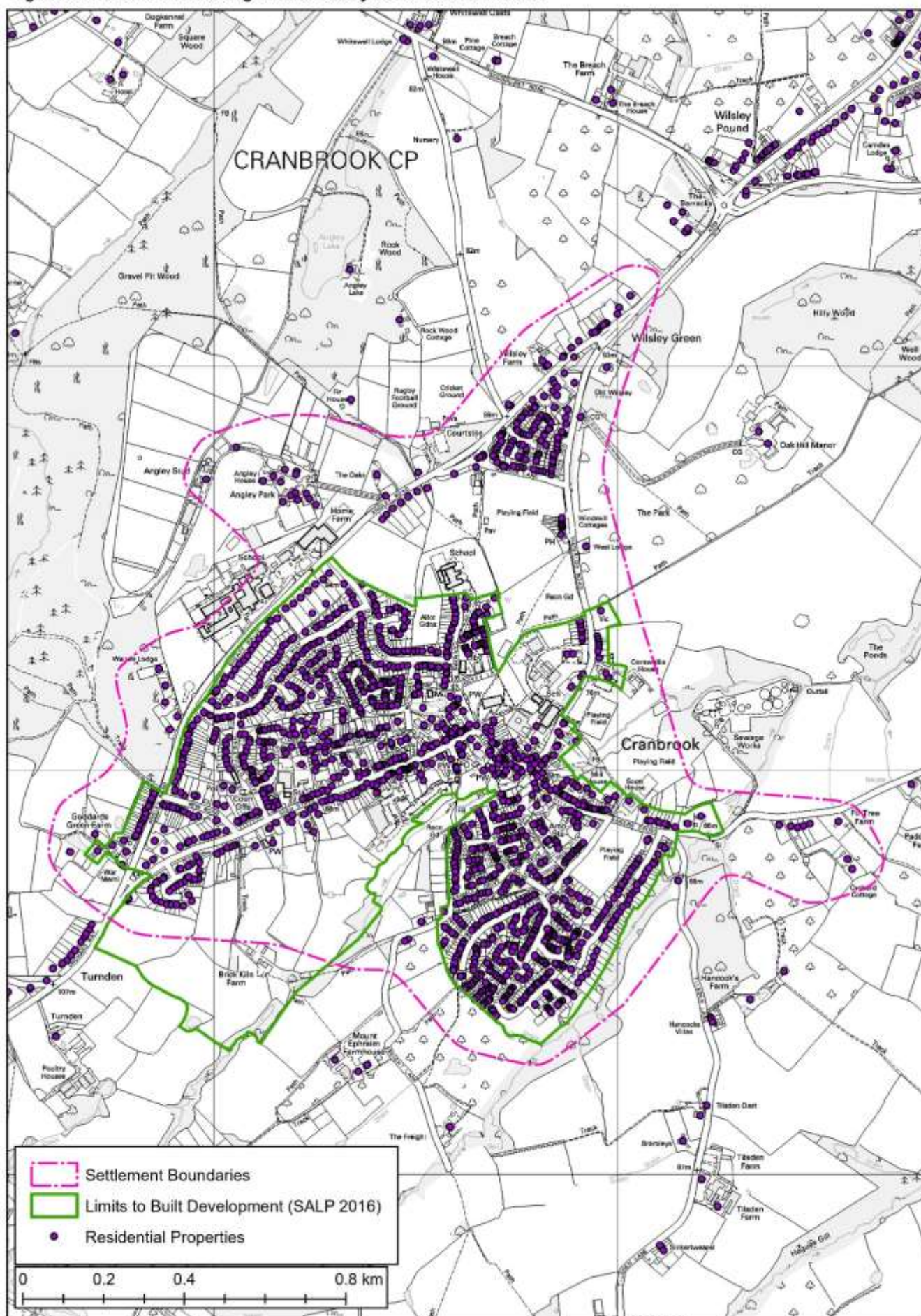
## Appendix 3 Section 2 – Settlement Maps for the AONB Villages

These maps show what is considered to be the settlement boundaries for the villages within the AONB (i.e. the area people would normally consider to be part of the settlement which typically extends beyond the Limits to Built Development (LBD)). They were created in November 2019.

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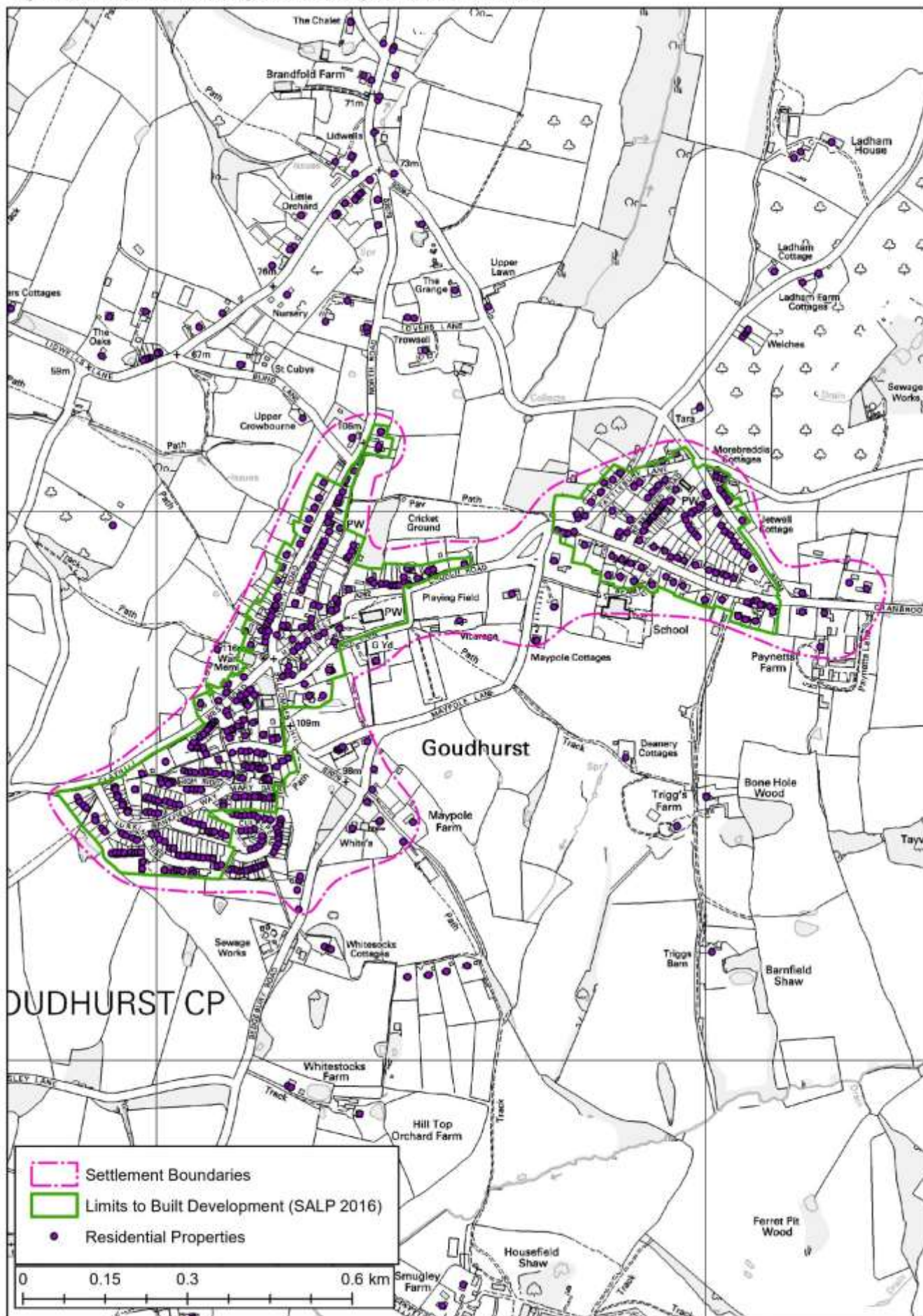


# High Weald Area of Outstanding Natural Beauty Settlement Boundaries



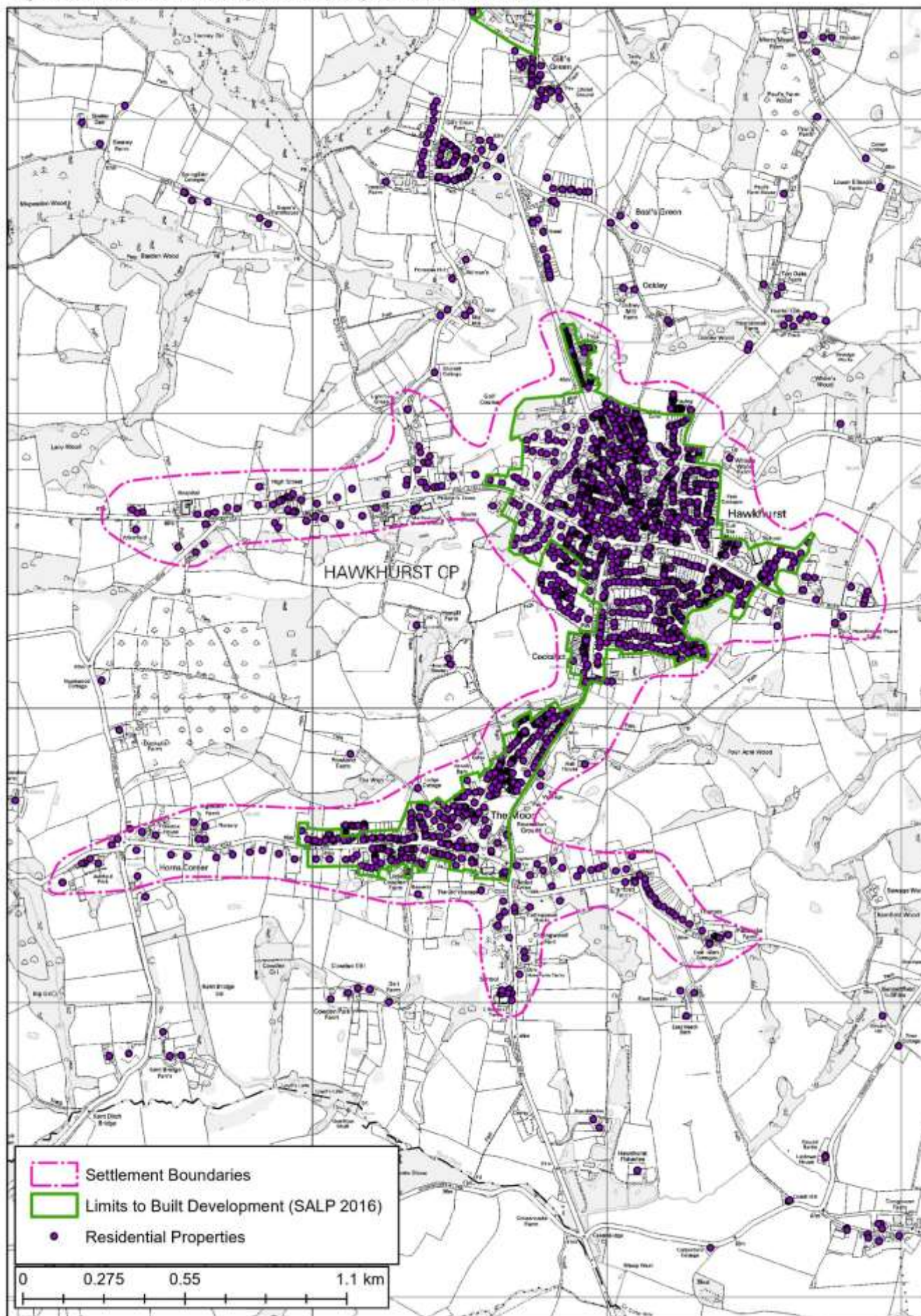


# High Weald Area of Outstanding Natural Beauty Settlement Boundaries



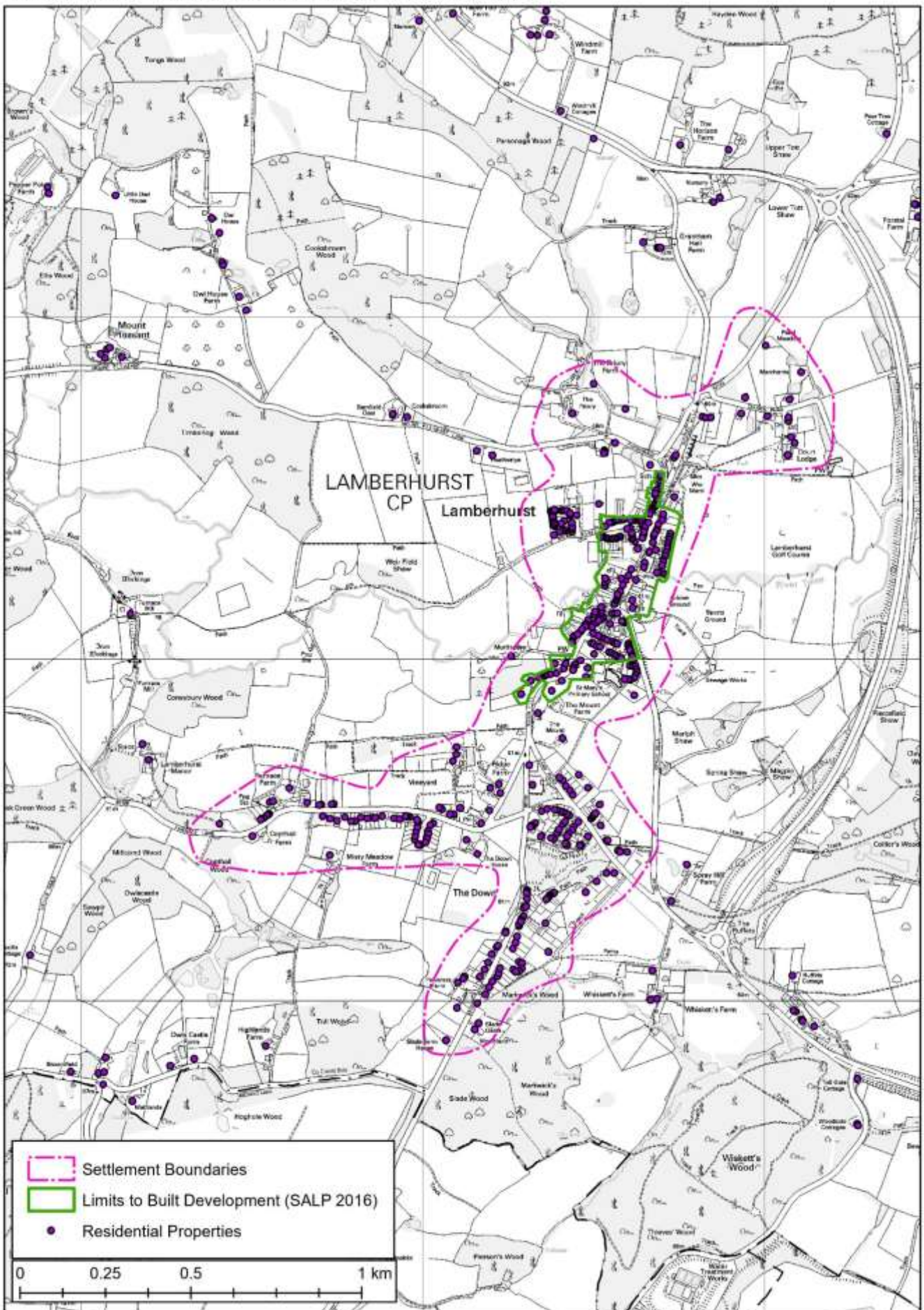


# High Weald Area of Outstanding Natural Beauty Settlement Boundaries



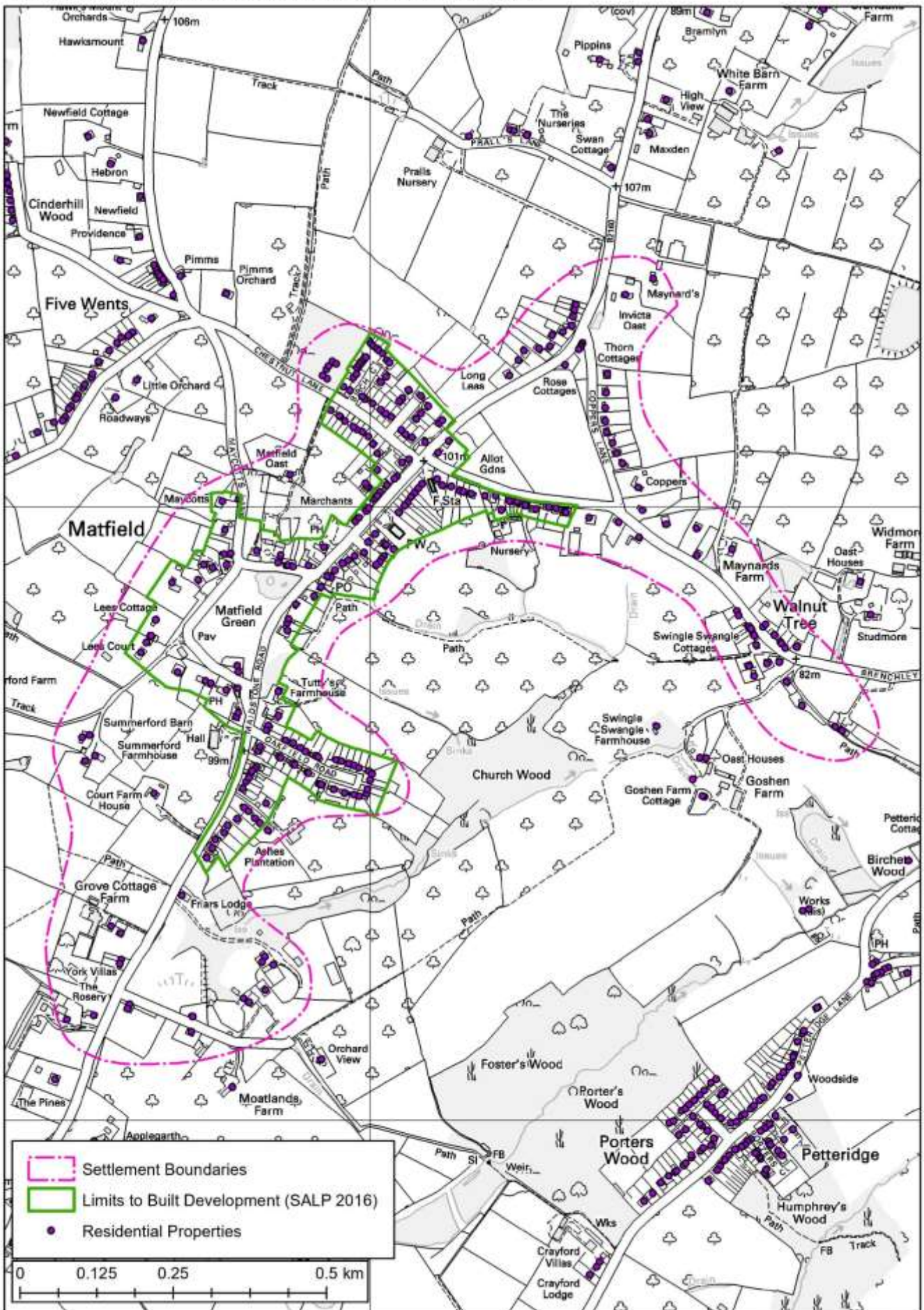


# High Weald Area of Outstanding Natural Beauty Settlement Boundaries





# High Weald Area of Outstanding Natural Beauty Settlement Boundaries





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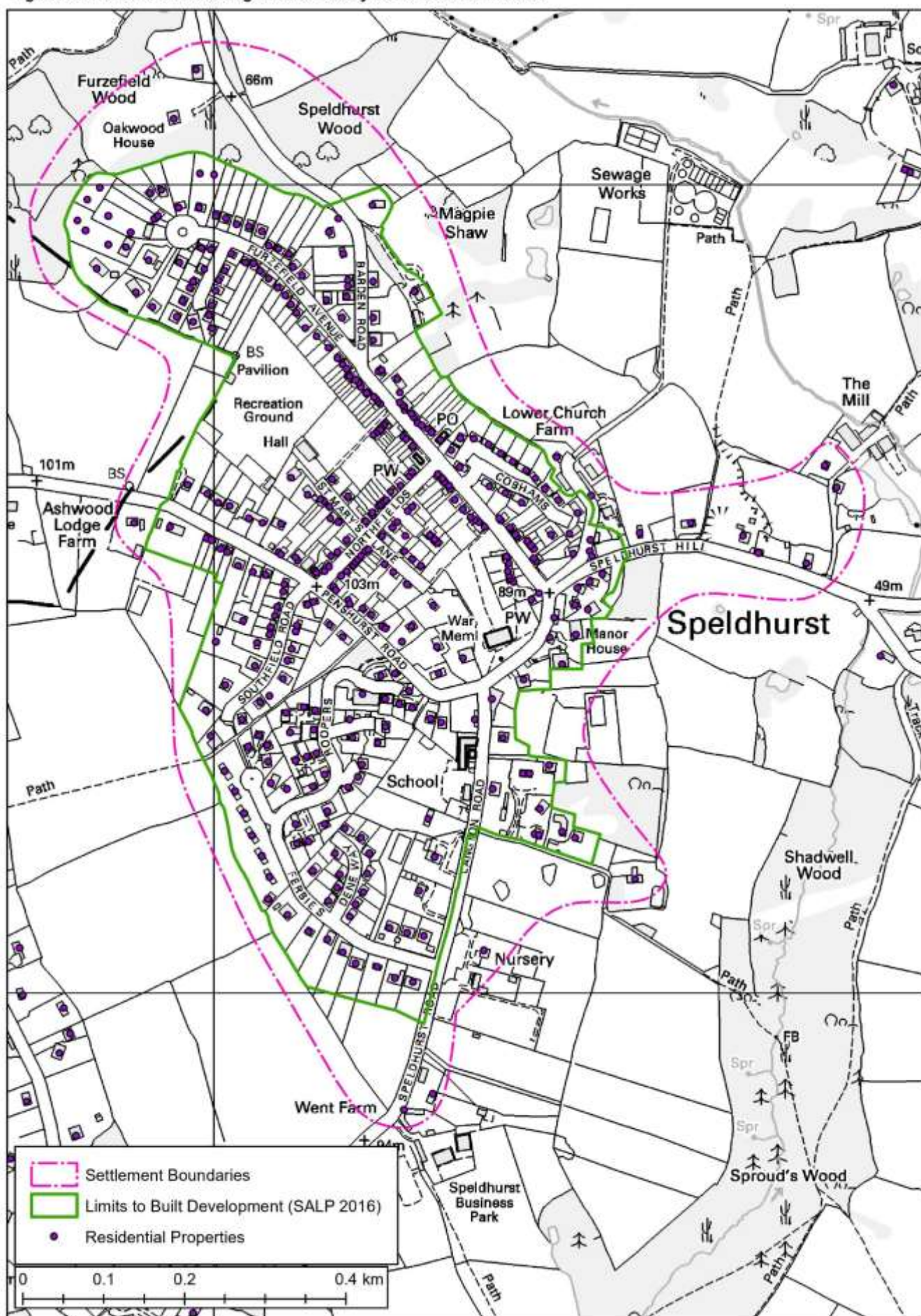
The map displays the Sandhurst area, including the village of Sandhurst and surrounding farms and fields. Key features include:

- Settlement Boundaries:** Indicated by a dashed pink line.
- Limits to Built Development (SALP 2016):** Indicated by a solid green line.
- Residential Properties:** Marked with purple dots.

Other labeled locations include Alderden Manor Farm, Lords Wood, Reynolds Farm, Sandhurst Primary School, The Sandhurst Windmill, Ringle Green, and various other farms and fields. A scale bar at the bottom indicates distances from 0 to 0.5 km.



# High Weald Area of Outstanding Natural Beauty Settlement Boundaries



# Appendix 4: Changes in the scale of AONB development from the Draft Plan

## Introduction

The table below compares the amount of development proposed within the AONB for the Tunbridge Wells Borough Local Plan at Regulation 18 (Draft LP) and Regulation 19 (the PSLP) in terms of numbers of sites and numbers of sites considered to be Major and in terms of housing numbers overall and at a settlement level.

It is important to note that in some cases the apparent reduction in number is as a result of some sites gaining planning consent and/or moving forward to construction but the most significant changes are the result of deleted sites. The significant increase of dwellings at Pembury is mainly the result of a previous employment site switching to residential use and a new site both of which are on previously developed land. In contrast the greenfield sites at Pembury which generally have a reduced level of development.

## Summary of table.

For the settlements at **Speldhurst**, **Goudhurst**, and **Benenden** there was no significant change in the extent or amount of development or sites proposed. At **Sandhurst** one small non-Major site was deleted as it was under construction and one small non major site added resulting in a small increase in proposed development.

Two non-Major sites out of four sites proposed were dropped from **Matfield** and one non-Major site at **Lamberhurst** out of two proposed were dropped resulting in a significant reduction in proposed amount of development for these settlements.

At **Pembury** the development on three sites (considered major due to a cumulative effect arising out of proximity to each other) was reduced and open spaces increased. In addition, one Major site was dropped 1 non-Major site was added. An employment site has been converted to a residential care home use and a new site for a care home added and although both are non-Major they have significantly increased the number of dwellings at **Pembury**. Although the overall result is significant increase in the proposed number of residential dwellings the increase is for in the form of care home facilities on previously developed sites and there has been a decrease in the greenfield land proposed for development.

At **Cranbrook** two Major sites and four non-Majors sites that proposed more than 350 dwelling have been dropped resulting in a significant reduction in development. Development that is still proposed includes one Major site previously allocated under the SALP the majority of which now has planning consent.

Development proposed at **Hawkhurst** has also been very significantly reduced both at **Hawkhurst Highgate** with two Major sits proposed for 550 dwellings dropped, and **Gills Green**, one Major site dropped and one reduced from Major to non-Major.

Out of the two sites proposed at **Southborough** the only proposed housing development for 150 dwellings has been dropped so that there is now no housing in the AONB for **Southborough**.

For **Royal Tunbridge Wells** one major site was dropped but equally important has been the changes to another Major site where the proposed number of dwelling has been reduced by more than half and the proposal to include a secondary school has been dropped.

**In summary there are 17 fewer proposed allocations in the AONB, there are eight fewer sites considered to be Major and the number of proposed dwellings has been reduced by more than 1,000 and equates to a 53% reduction in the number of dwellings proposed.**

Table 12: Comparison of the scale of AONB development proposed at Regulation 18 and Regulation 19

Settlement	Development Proposed		Number of sites		Number of Majors		# reduction in numbers of dwellings.
	Reg. 18	Reg. 19	Reg. 18	Reg. 19	Reg. 18	Reg. 19	
Royal Tunbridge Wells	270 dwellings 80,000 Recreation/sports provision Further employment land	120 dwellings 80,000 Recreation/sports provision	4	3	3	2	-150
Southborough	Hotel/conference 120 dwellings	Hotel/conference	2	1	1	0	-120
Cranbrook and Sissinghurst*	250 170 20 15	180 45 204 =429	9	3	4	3	-374

Settlement	Development Proposed		Number of sites		Number of Majors		# reduction in numbers of dwellings.
	Reg. 18	Reg. 19	Reg. 18	Reg. 19	Reg. 18	Reg. 19	
	35 28 45 90 150 =803						
Hawkhurst – Highgate and The Moor	12 25 79 450 28 100 = 694 Community facility	43 25 24 79 = 171 Medical centre Community facility	9	6	4	2	-523
Hawkhurst – Gills Green	38 Employment land	Employment land	3	2	2	0	-38
Benenden	25 30 12 =67	20 25 =45	3	2	0	0	-22
Matfield and Brenchley	45 15 30 60 = 150	45 15 = 60	4	2	1	1	-90
Goudhurst	14 11	14 11	2	2	0	0	0
Lamberhurst	30 30 = 60	30	2	1	0	0	-30
Pembury	80	60	7	6	4	3	+ 148

Settlement	Development Proposed		Number of sites		Number of Majors		# reduction in numbers of dwellings.
	Reg. 18	Reg. 19	Reg. 18	Reg. 19	Reg. 18	Reg. 19	
	90 90 25 = 285 Employment Key medical facility	80 80 25 120 68 = 433					
Sandhurst	15 12 = 27	15 15 = 30	2	2	0	0	+ 3
Speldhurst	12 Recreation/sports	12 Recreation/sports	2	2	0	0	0
Total	2,566	1,370	49	32	19	11	-1,196



# Appendix 5: Scales of development inside and outside the AONB

Set out below are two tables the first (Table 13) being a summary of the second; **Development proposed for Regulation 19 showing development proposed inside and outside the AONB** (Table 14). They show all proposed allocations within the PSLP that provide for built development and separate out those within and those outside the AONB in order to demonstrate the priority given to placing development outside the AONB.

In addition, for those sites within the AONB the allocations are broken down into areas proposed for development and areas retained as open space/landscape buffer as expected of a policy compliant proposal. It should however be noted that not all of what is shown as the developable area of a site will be developed as it may include landscape features, play spaces and SuDs features such as attenuation ponds. Also, sites such as RTW 19 Land to the North of Hawkenbury Recreation Ground, has for the purpose of this exercise been assumed as developed (apart from the noted landscape buffer) even though it is largely to be playing fields, due to uncertainty of scale and location of built form. Taking this approach, the figures have shown a precautionary approach.

The key conclusion of this table is that of all sites allocated in the PSLP the vast majority are outside the AONB even though it covers 69% of the Borough. The total area in hectares of land allocated in the PSLP is 857ha, of which the amount in the AONB is 175ha which amounts to around 20% of all allocations. However, the figures also show that of the land allocated in the AONB more than 50% is set aside for open space/landscape buffers to ensure that sites can make a positive contribution to the AONB landscape. In total the AONB allocations will deliver 82ha of built development and more than 87ha of green space.

The total of allocated land in the PSLP covered by the AONB designation (175ha) is less than 1% of the AONB within the Borough and taking account of the provision made within the policies for open space/landscape buffers as noted above the PSLP is then likely to result in less than 0.4% of the AONB within the borough being built upon. It must be remembered that this does not result in a loss of AONB as no land will be removed from the designation. Sites within the AONB will continue to benefit from the protection that the AONB designation infers and much of what is proposed in terms of landscape and green space will result in the protection and enhancement of AONB features.

**Table 13: Summary of development inside and outside the AONB**

<b>Totals</b>	<b>Area (Ha)</b>	<b>as a % of the Borough</b>	<b>as a % of AONB within the Borough</b>
Borough	33132.88879	-	-
AONB	22829.08245	68.90%	
Allocated Area	857.182	2.59%	
Allocated Area in AONB	175.232	-	0.77%
Allocated Developable Area in AONB	82.600	-	0.36%
Open Space buffer	87.330		0.38%

**Table 14: Development proposed for regulation 19 showing development proposed inside and outside the AONB**

Local Plan Order	Site	Site Address	Total Allocation Area (Ha)	Allocation area Outside AONB (Ha)	Allocation area Inside AONB (Ha)	This site as a % of total area of AONB within the borough	Developable area within AONB (Ha)	Open Space in AONB (Ha)	Site as a % of total area of all proposed allocations in Reg 19	% of developable allocation within the AONB
1	RTW 1	Former Cinema Site, Mount Pleasant Road	0.798	0.798	0.000	0.000%	0.000	0.000	0.093%	0.000%
2	RTW 2	Land at the Auction House, Linden Park Road	0.050	0.050	0.000	0.000%	0.000	0.000	0.006%	0.000%
3	RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	0.450	0.450	0.000	0.000%	0.000	0.000	0.053%	0.000%
4	RTW 4	Land at 36-46 St John's Road	0.498	0.498	0.000	0.000%	0.000	0.000	0.058%	0.000%
5	RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	7.396	7.396	0.000	0.000%	0.000	0.000	0.863%	0.000%

Local Plan Order	Site	Site Address	Total Allocation Area (Ha)	Allocation area Outside AONB (Ha)	Allocation area Inside AONB (Ha)	This site as a % of total area of AONB within the borough	Developable area within AONB (Ha)	Open Space in AONB (Ha)	Site as a % of total area of all proposed allocations in Reg 19	% of developable allocation within the AONB
6	RTW 6	202 and 230 Upper Grosvenor Road	0.528	0.528	0.000	0.000%	0.000	0.000	0.062%	0.000%
7	RTW 7	Land at Former Gas Works, Sandhurst Road	1.782	1.782	0.000	0.000%	0.000	0.000	0.208%	0.000%
8	RTW 8	TN2 Centre and adjacent land, Greggs Wood Road, Sherwood	0.199	0.199	0.000	0.000%	0.000	0.000	0.023%	0.000%
9	RTW 9	Land at Beechwood Sacred Heart School	0.674	0.674	0.000	0.000%	0.000	0.000	0.079%	0.000%
10	RTW 10	Montacute Gardens	0.860	0.860	0.000	0.000%	0.000	0.000	0.100%	0.000%
11	RTW 11	Former Plant & Tool Hire, Eridge Road	0.516	0.516	0.000	0.000%	0.000	0.000	0.060%	0.000%
12	RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	1.083	1.083	0.000	0.000%	0.000	0.000	0.126%	0.000%
13	RTW 13	Turners Pie Factory,	1.351	1.351	0.000	0.000%	0.000	0.000	0.158%	0.000%

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		Broadwater Lane								
14	RTW 14	Land at Wyevale Garden Centre, Eridge Road	7.920	7.920	0.000	0.000%	0.000	0.000	0.924%	0.000%
15	RTW 15	Land at Showfields Road and Rowan Tree Road	7.073	7.073	0.000	0.000%	0.000	0.000	0.825%	0.000%
16	RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	15.817	5.228	10.589	0.046%	0.069	10.520	1.845%	0.437%
17	RTW 17	Land adjacent to Longfield Road	36.722	0.000	36.722	0.161%	14.029	20.096	4.284%	38.202%
18	RTW 18	Land at the former North Farm landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate	21.164	21.164	0.000	0.000%	0.000	0.000	2.469%	0.000%
19	RTW 19	Land to the North of Hawkenbury	7.105	0.041	7.064	0.031%	6.214	0.849	0.829%	87.470%

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		Recreation Ground								
20	RTW 20	Land at Culverden Stadium, Culverden Down	3.602	3.602	0.000	0.000%	0.000	0.000	0.420%	0.000%
21	RTW 21	Land at Colebrook Sports Field, Liptraps Lane	4.222	4.222	0.000	0.000%	0.000	0.000	0.493%	0.000%
22	RTW 22	Land at Bayham Sports Field West	1.945	1.945	0.000	0.000%	0.000	0.000	0.227%	0.000%
23	SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	0.558	0.558	0.000	0.000%	0.000	0.000	0.065%	0.000%
24	SO 2	Land at Mabledon House	12.622	0.032	12.590	0.055%	2.852	9.738	1.473%	22.596%
25	SO 3	Land at Baldwins Lane	0.457	0.457	0.000	0.000%	0.000	0.000	0.053%	0.000%

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26	SS 1	The Strategy for Paddock Wood and east Capel	360.575	360.575	0.000	0.000%	0.000	0.000	42.065%	0.000%
27	SS 2	The Strategy for Paddock Wood Town Centre	6.398	6.398	0.000	0.000%	0.000	0.000	0.746%	0.000%
28	SS 3	The Strategy for Tudeley Village	176.385	176.385	0.000	0.000%	0.000	0.000	20.577%	0.000%
29	PW 1	Land at Mascalls Farm	28.008	28.008	0.000	0.000%	0.000	0.000	3.267%	0.000%
30	CRS 1	Land at Brick Kiln Farm Cranbrook	12.278	0.000	12.278	0.054%	6.465	4.402	1.432%	52.660%
31	CRS 2	Land South of Corn Hall Crane Valley	6.817	0.000	6.817	0.030%	2.017	3.209	0.795%	29.588%
32	CRS 3	Turnden Farm, Hartley Road	27.637	0.000	27.637	0.121%	7.443	20.194	3.224%	26.930%
33	CRS 6	Land south of The Street, Sissinghurst	0.584	0.584	0.000	0.000%	0.000	0.000	0.068%	0.000%
34	CRS 7	Land at the Corner of Frittenden Road and	1.607	1.607	0.000	0.000%	0.000	0.000	0.187%	0.000%

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		Common Road								
35	HA 1	Land at the White House	0.609	0.000	0.609	0.003%	0.609	0.000	0.071%	100.000%
36	HA 2	Brook House, Cranbrook Road	0.644	0.000	0.644	0.003%	0.644	0.000	0.075%	100.000%
37	HA 3	Former site of Springfield Nurseries	1.517	0.000	1.517	0.007%	1.517	0.000	0.177%	100.000%
38	HA 4	Land off Copthall Avenue and Highgate Hill	6.598	0.000	6.598	0.029%	3.687	2.911	0.770%	55.875%
39	HA 5	Sports Pavilion, King George V Playing Fields, The More	2.859	0.000	2.859	0.013%	2.859	0.000	0.334%	100.000%
40	HA 6	Hawkhurst Station Business Park	2.138	0.000	2.138	0.009%	1.269	0.869	0.249%	59.370%
41	HA 7	Site at Limes Grove (March's Field)	0.548	0.548	0.000	0.000%	0.416	0.098	0.064%	76.058%
42	BE 1	Land adjacent to New Pond Road (known as	0.777	0.000	0.777	0.003%	0.777	0.000	0.091%	100.000%



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		Uphill), Benenden								
43	BE 2	Feoffee Cottages and land, Walkhurst Road, Benenden	1.691	0.000	1.691	0.007%	0.989	0.702	0.197%	58.499%
44	BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	3.073	3.047	0.025	0.000%	0.025	0.000	0.358%	0.829%
45	BE 4	Land at Benenden Hospital (north of Goddards Green Road), East End	3.715	3.715	0.000	0.000%	0.000	0.000	0.433%	0.000%
46	BM 1	Land between Brenchley Road, Coppers Lane and Maidstone Road	2.844	0.000	2.844	0.012%	1.854	0.989	0.332%	65.216%
47	BM 2	Land at Maidstone Road	1.651	0.000	1.651	0.007%	1.098	0.553	0.193%	66.486%
48	FR 1	Land at Cranbrook Road, Frittenden	1.533	1.533	0.000	0.000%	0.000	0.000	0.179%	0.000%

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49	GO 1	Land east of Balcombes Hill and adjacent to Tiddymotts Lane	1.073	0.000	1.073	0.005%	0.714	0.359	0.125%	66.516%
50	GO 2	Land at Triggs Farm, Cranbrook Road	1.500	0.000	1.500	0.007%	1.210	0.291	0.175%	80.617%
51	HO 1	Land adjacent to Furnace Lane and Gibbet Lane	1.821	1.821	0.000	0.000%	0.000	0.000	0.212%	0.000%
52	HO 2	Land south of Brenchley Road west of Fromandez Drive	3.478	3.478	0.000	0.000%	0.000	0.000	0.406%	0.000%
53	HO 3	Land to the east of Horsmonden	18.999	18.999	0.000	0.000%	0.000	0.000	2.216%	0.000%
54	LA 1	Land to the west of Spray Hill	4.069	0.000	4.069	0.018%	1.688	2.381	0.475%	41.494%
55	PE 1	Land rear of High Street and west of Chalket Lane	6.667	0.210	6.457	0.028%	3.411	2.925	0.778%	51.160%

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56	PE 2	Land at Hubbles Farm and south of Hastings Road	5.491	0.153	5.338	0.023%	3.981	1.358	0.641%	72.494%
57	PE 3	Land north of the A21, south and west of Hastings Road	4.781	0.119	4.662	0.020%	2.341	2.320	0.558%	48.973%
58	PE 4	Land at Downingbury Farm, Maidstone Road	4.556	0.472	4.084	0.018%	3.756	0.264	0.531%	82.443%
59	PE 5	Land at Sturgeons fronting Henwood Green Road	0.463	0.458	0.004	0.000%	0.004	0.000	0.054%	0.961%
60	PE 6	Woodsgate Corner, Pembury	2.412	0.059	2.353	0.010%	1.545	0.808	0.281%	64.050%
61	PE 7	Cornford Court, Cornford Lane	1.034	0.000	1.034	0.005%	0.635	0.399	0.121%	61.436%
62	PE 8	Owlsnest, Tonbridge Road	5.034	5.030	0.003	0.000%	0.000	0.003	0.587%	0.000%
63	RU 1	Lifestyle Motor Europe, Langton	0.323	0.323	0.000	0.000%	0.000	0.000	0.038%	0.000%

Local Plan Order	Site	Site Address	Total Allocation Area (Ha)	Allocation area Outside AONB (Ha)	Allocation area Inside AONB (Ha)	This site as a % of total area of AONB within the borough	Developable area within AONB (Ha)	Open Space in AONB (Ha)	Site as a % of total area of all proposed allocations in Reg 19	% of developable allocation within the AONB
		Road								
64	SA 1	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane, Sandhurst	1.034	0.000	1.034	0.005%	0.805	0.229	0.121%	77.832%
65	SA 2	Sharps Hill Farm, Queen Street	1.540	0.000	1.540	0.007%	0.796	0.744	0.180%	51.682%
66	SP 1	Land to the west of Langton Road, and south of Ferbies	0.789	0.000	0.789	0.003%	0.639	0.118	0.092%	80.936%
67	SP 2	Land at and adjacent to Rusthall Recreation Ground, Southwood Road	6.240	0.000	6.240	0.027%	6.240	0.000	0.728%	100.000%
Totals			857.182	681.950	175.232	-	82.600	87.330	-	-

# Appendix 6: Review of strategic sites against paragraph 72 of the NPPF

Table 15: Consideration of proposed strategic allocation sites against paragraph 72 of the NPPF

	a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;	b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;	c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided	d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and	e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size
<b>Tudeley</b>	<p><u>Infrastructure</u></p> <p>Given the undeveloped nature of the site itself, the existing on-site health, water, community, public and social service open space, sport and recreation infrastructure is limited, although this will be the case for many greenfield sites for new settlements.</p> <p>The site is served by the Capel primary school adjacent to its eastern edge, and the existing green infrastructure at the site is considerable.</p> <p>Importantly, the site itself is geographically well related to the infrastructure at Tonbridge, RTW/</p>	<p>Consideration of the site size has been given within both the SA and the SHELAA, particularly consideration of a larger site (SHELAA reference 446) which extended to both the north and south. However, the location of the southern portion of this larger site in the AONB, and the extent of the flood plain of the river Medway to the north has meant that</p>	<p>The policy wording STR/SS3) is clear about the expectations of the highest quality development, and specific reference is made to a requirement for development to proceed on garden community principles.</p> <p>This requirement has</p>	<p>The assessment of delivery rates and timelines are realistic, and are set out in the Housing Delivery and Trajectory Topic Paper.</p>	<p>The settlement would (given that it is proposed to be removed from the Green Belt), be surrounded by existing Green Belt.</p>

	a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;	b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;	c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided	d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and	e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size
	<p>Southborough and Paddock Wood, with the potential for high quality public transport and active travel links to these locations.</p> <p>The Council commissioned a Strategic Sites Infrastructure Framework to identify the requisite infrastructure to support a garden settlement in this location. This is detailed in the Strategic Sites Masterplanning and Infrastructure Study 2021 and the Infrastructure Delivery Plan:</p> <p><u>Economic potential</u></p> <p>The area is considered to have good economic potential: in terms of the provision of employment opportunities on site, it would be relatively well located to the A21. It is identified in the Economic Needs Study (2016) at paras 9.68- 9.69 (2016) that the A21 growth corridor is recognised as an excellent opportunity for new employment (<b>see Economic Needs Study</b>).</p> <p>The site would also have a good workforce catchment, both from the development itself, and likewise though being well located relatively to</p>	<p>this alternative has been discounted through the SA and SHELAA processes.</p> <p>There are some limited services available at the boundaries of the site, including restaurants, public houses and a church.</p> <p>The level of services provided in settlements of similar sizes in the Borough provides good access to services, and there are no reasons to consider that similar services would not be sustained at this development.</p> <p>The comprehensive</p>	<p>informed the masterplanning work in the Tudeley Village Delivery Strategy and the requisite infrastructure identified in the Infrastructure Framework to ensure the development not only provides the necessary infrastructure to mitigate growth; but the infrastructure required to ensure the settlement is delivered on garden settlement principles.</p>		

	<p>a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;</p>	<p>b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;</p>	<p>c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided</p>	<p>d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and</p>	<p>e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size</p>
	<p>Tonbridge, Paddock Wood, Five Oak Green and Southborough/RTW, with access via proposed active travel links.</p> <p>Likewise, the Economic Needs Study identifies that the majority of employment in the borough is provided at Southborough/Royal Tunbridge Wells and Paddock Wood: Tonbridge also contains considerable employment. The area therefore has the potential to improve the economy through additional patronage of services in these locations by new residents, and additional workforce availability for existing businesses.</p> <p>The Transport Assessment Report recognises that considerable travel from this northern part of the borough to London (and back) for work, and it is expected that there would still be an element of such travel albeit with the impacts of Covid perhaps in a slightly more flexible manner: this can serve to benefit the economy of the wider region, but also the local area through salary spend (earned in London) more locally.</p>	<p>masterplanning work that has been undertaken for this settlement (Tudeley Village Delivery Strategy) identifies the appropriate mix of uses and level of floorspace to help encourage internalisation of trips to create and sustain a mixed and balanced community.</p> <p>Additionally, as referred to in relation to consideration a), the site is well located relatively to the larger settlements of Tonbridge, Paddock Wood, RTW/Southborough, with the potential for high quality public transport links to the services, employment and rail links available in those</p>			

	a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;	b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;	c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided	d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and	e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size
	<p>The development is of such a scale that the construction of the site would create significant employment opportunities and associated local economic benefit through the supply chain – although it is recognised that this is the case for any developments of such scale.</p> <p><u>Scope for environmental gains</u></p> <p>The site itself, together with the wider landholding of the site owners, provides considerable scope for net environmental gains, in terms of environmental quality, public accessibility, ecology and biodiversity, and managing/mitigating flood risk, including the delivery of betterment to some residents of Five Oak Green through reducing existing flood risk.</p>	locations.			
<b>Land at Capel and Paddock Wood</b>	<p><u>Infrastructure</u></p> <p>There is considerable existing infrastructure in Paddock Wood, including in terms of transport (road and rail), education (primary and secondary), health, open space, etc. However, there are some elements of the existing</p>	Consideration of the site size has been given within both the SA and the SHELAA, through the combination of different sites submitted in the Call	The policy wording STR/SS1 is clear about the expectations of the high quality development, and specific reference is made to a requirement for	The assessment of delivery rates and timelines are realistic, and are set out in the Housing Delivery	Consideration has been given to the provision of additional Green Belt to the east of Paddock



	<p>a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;</p>	<p>b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;</p>	<p>c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided</p>	<p>d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and</p>	<p>e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size</p>
	<p>infrastructure which are under considerable pressure, including foul water provision.</p> <p>The growth around Paddock Wood, including land in east Capel, has been comprehensively masterplanned to ensure the growth is properly considered, and the requisite infrastructure to deliver the growth on garden settlement principles incorporated. Please see the Strategic Sites Masterplanning and Infrastructure Study for details. The infrastructure required for the settlement is also detailed in the Infrastructure Delivery Plan.</p> <p><u>Economic potential</u></p> <p>Paddock Wood and land immediately adjacent to this has strong links with Tonbridge and RTW, and has good access to Maidstone and Ashford via Paddock Wood train station, and the A228 connects the location to the rest of the Medway Towns.</p>	<p>for Sites. Within the SA the various combinations scored differently, although as explained in the SA and this Paper the Council considers that the option proposed is that to be pursued.</p> <p>There are significant services available within the existing town centre, some limited services available at the boundaries of the site, including restaurants, public houses and a church. The site is well located relatively to the larger settlements of Tonbridge, Paddock Wood, Royal Tunbridge Wells and Maidstone.</p>	<p>development to proceed on garden community principles.</p> <p>The Masterplanning and Infrastructure Study 2021 has also been prepared with full consideration to the Garden Settlement Principles.</p>	<p>and Trajectory Topic Paper.</p>	<p>Wood. However, given that the A228 would provide a defined physical boundary which is readily recognisable and likely to be permanent.</p>

	a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;	b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;	c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided	d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and	e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size
	<p>The Economic Needs Study identifies that the majority of employment in the borough is provided at Southborough/Royal Tunbridge Wells and Paddock Wood. Paras 9.47 – 9.53 of this Study specifically identify that the land to the east of Maidstone Way and the Eldon Way employment areas are well occupied and provide a good base for future employment expansion: i.e. there is a range of existing businesses in the local area that provide good ground to develop further economies of agglomeration. The masterplanning around Paddock Wood has fully considered growth of the Key Employment Areas to the north.</p> <p>The centre of Paddock Wood is modest, but has a supermarket, local shops and attractive: it is considered that growth in the population of Paddock Wood and surrounds (including in eastern Capel) would be beneficial in strengthening the existing town centre in terms of its employment offer and economy and a town centre masterplan has been developed to</p>	<p>Additionally, as referred to in relation to consideration a), the site is well located relatively to the larger settlements of Tonbridge, RTW/Southborough, with the potential for high quality public transport links to the services, employment and rail links available in those locations. incorporated relevant services and facilities to serve the needs of the community and deliver the settlement sustainability.</p> <p>A larger population and rejuvenated/regenerated town centre would have cultural and community benefits.</p>			

	<p>a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;</p>	<p>b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;</p>	<p>c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided</p>	<p>d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and</p>	<p>e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size</p>
	<p>respond to this opportunity. In particular, significantly larger population could be expected to retain and grow more and higher-order shops and services in the settlement</p> <p><u>Scope for environmental gains</u></p> <p>It is considered that the key scope for environmental gains is through the rejuvenation and regeneration of the town centre, and in the provision of flooding infrastructure, which the Strategic Flood Risk Assessment has identified provides the opportunity to delivery “betterment” to some existing areas within Capel and Paddock Wood. The masterplanning approach has also identified potential for net environmental gains, in terms of environmental quality, public accessibility, ecology and biodiversity.</p>				

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