

**Tunbridge Wells Borough Council**

# **Green Belt Study Stage Three Assessment of Green Belt Allocations**

**Final report**

Prepared by LUC  
November 2020



## Tunbridge Wells Borough Council

### Green Belt Study Stage Three

#### Assessment of Green Belt Allocations

#### Project Number

11143

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# Chapter 1

## Introduction

**1.1** Tunbridge Wells Borough Council (TWBC) has identified a number of potential development sites within the Green Belt in its draft Regulation 18 Local Plan<sup>1</sup>. These were identified on the basis of a wide range of considerations, including the outputs of earlier (Stage One and Stage Two) Green Belt studies and various sustainability and need-case factors.

**1.2** LUC was commissioned by Tunbridge Wells Borough Council (TWBC) to undertake an assessment of the potential 'harm' to the Green Belt purposes associated with the release of the proposed development sites. This 'Stage Three Study' will form an important part of the Council's evidence base for a new Local Plan and will inform the policies and sites proposed in the final version of the Local Plan to be submitted for examination.

### Study aim and scope

**1.3** The overall purpose of the Stage Three Study is to provide an independent, robust and transparent assessment of the potential harm of releasing Green Belt land in line with national policy, guidance and case law. It also considers potential mitigation measures to minimise harm and reviews opportunities to enhance the beneficial use of land remaining in the Green Belt.

**1.4** The NPPF states in Paragraphs 135 and 136 that "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans".

**1.5** Legal case law, as established in *Calverton Parish Council v Greater Nottingham Councils & others* (2015), indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the "nature and extent of

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<sup>1</sup> Tunbridge Wells Borough Local Plan, Draft Local Plan Regulation 18 Consultation Draft, 20 September to 01 November.

harm" to the Green Belt 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".

**1.6** The Stage Three Study builds on the existing Tunbridge Wells Green Belt studies, which include:

- Tunbridge Wells Green Belt Strategic Study (2016) – the Stage One study identified areas that clearly make a strong contribution to one or more Green Belt purpose – ‘Broad Areas’ – and then subdivided those areas potentially not making a strong Green Belt contribution into smaller assessment ‘Parcels’. It considered which areas, a further ‘Stage Two’ Green Belt review should be undertaken; and
- Tunbridge Wells Green Belt Study Stage Two (2017) – the Stage Two study comprised a more detailed and focussed review of 37 assessment parcels and 10 broad areas identified around settlements in the Strategic Study, using a consistent approach of rating their contribution to each of the five Green Belt purposes as set out in the National Planning Policy Framework (NPPF).

**1.7** The Stage Two Study provided a rating for each identified parcel for ‘harm of release’, but this was a basic measure that did not reflect a detailed analysis of the relationship between a parcel and adjacent Green Belt land. It was stated in Paragraph 5.17 of that study that “a more refined assessment of harm, considering the impact of Green Belt release on the contribution of adjacent retained Green Belt, can be carried out if development scenarios are suggested.” This Stage Three Study provides that more refined assessment.

**1.8** The purpose of the Stage Three Study is not to identify land that is suitable for development, or to set out the exceptional circumstances for releasing land from the Green Belt. These will be matters for the Council to consider in its local plan. The outputs, alongside wider evidence relating to other environmental/sustainability considerations, will inform decisions regarding the relative merits of meeting the Councils’ development needs in different locations.

## Report authors

**1.9** This report has been prepared by LUC on behalf of TWBC. LUC has completed Green Belt studies at a range of scales for over 45 English local planning authorities in the past five years.

Several of these have been subject to scrutiny at Local Plan Examinations and have been found to be robust.

## Report structure

**1.10** The remainder of this report is structured as follows:

- Chapter 2 sets out the national and local policy context, and an overview of Green Belt within TWBC.
- Chapter 3 outlines the methodology used to undertake the assessment of harm.
- Chapter 4 details the harm assessments for the draft allocation sites, followed by a summary.
- Chapter 5 assesses the strength of remaining Green Belt.
- Chapter 6 considers next steps.

# Chapter 2

## Green Belt Policy and Context

### Introduction

**2.1** This chapter provides a summary of national and local Green Belt policy, and sets out the evolution of the Metropolitan Green Belt.

### National planning policy and guidance

#### National Planning Policy Framework

**2.2** Government policy on the Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)<sup>2</sup> Protecting Green Belt Land. Paragraph 133 of the NPPF states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

**2.3** This is elaborated in NPPF paragraph 134, which states that Green Belts serve five purposes, as set out below.

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<sup>2</sup> Department of Communities and Local Government (2018) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

### **The purposes of Green Belt**

- 1) To check the unrestricted sprawl of large built-up areas.
- 2) To prevent neighbouring towns merging into one another.
- 3) To assist in safeguarding the countryside from encroachment.
- 4) To preserve the setting and special character of historic towns.
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**2.4** The NPPF emphasises in paragraphs 135 and 136 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. It goes on to state 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. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period”.

**2.5** When defining Green Belt boundaries NPPF paragraph 139 states local planning authorities should:

- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- safeguard enough non-Green Belt land to meet development needs beyond the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

**2.6** Current planning guidance makes it clear that the Green Belt is a strategic planning policy constraint designed primarily to prevent the spread of built development and the coalescence of urban areas. The NPPF requires local plans to “set out ways in which the impact of removing



land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land” (paragraph 138). It goes on to state “local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land” (paragraph 141).

**2.7** It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by keeping land permanently open. Openness is not synonymous with landscape character or quality.

**2.8** Paragraph 143 and 144 state that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”.

**2.9** New buildings are inappropriate in the Green Belt, albeit with some exceptions which are set out in two closed lists. The first is in paragraph 145 which sets out the following exceptions:

- “buildings for agriculture and forestry;
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan; and

- limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
  - not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

**2.10** Finally, paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. These include:

- “mineral extraction;
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction;
- material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and
- development brought forward under a Community Right to Build Order or Neighbourhood Development Order.”

## Planning Practice Guidance

**2.11** The NPPF's Green Belt policies are supplemented by additional National Planning Practice Guidance (NPPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations borne out by specific case law judgements. The guidance states

openness is capable of having both spatial and visual aspects<sup>3</sup>. Other circumstances which have the potential to affect judgements on the impact of development on openness include:

- the duration of development and its remediability to the original or to an equivalent (or improved) state of, openness; and
- the degree of activity likely to be generated by development, such as traffic generation.

**2.12** The guidance also elaborates on paragraph 138 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including:

- “new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.”

**2.13** Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of

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<sup>3</sup> Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section below.

works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.

## Planning Advisory Service Guidance

**2.14** Neither the NPPF nor NPPG provide guidance on how to undertake Green Belt studies. However, the Planning Advisory Service (PAS) published an advice note<sup>4</sup> in 2015 that discusses some of the key issues associated with assessing the Green Belt. Reference to the PAS guidance is included in the Methodology section in Chapter 3 where relevant.

## Evolution of the Metropolitan Green Belt

**2.15** The principle of maintaining a ring of open country around London can be traced back to the 16<sup>th</sup> century when, by royal proclamation, Elizabeth I forbade any building on new sites within three miles of the city gates of London. This was motivated by public health reasons, to prevent the spread of the plague, and to ensure a constant supply of food for the metropolis. The importance of these considerations was later recognised by Ebenezer Howard, a pioneer of British town planning, in his book of 1898 'Tomorrow: a Peaceful Path to Real Reform', in which he stated "an attractive setting within the town could develop and which would maintain, close at hand, the fresh delights of the countryside- field, hedgerow and woodland".

**2.16** The only mechanism available at the time to realise this vision, however, was the acquisition of land by public authorities. The most active agency in this field was the City of London Corporation whose programme of acquisition, initiated in 1878, included Epping Forest and Kenley Common. In 1935 the London County Council put forward a scheme "to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable". This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around

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<sup>4</sup> Planning on the Doorstep: The Big Issues – Green Belt,  
<https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

London were purchased by the London County Council and adjacent counties, either individually or jointly.

**2.17** During the Second World War, the newly formed Ministry of Town and Country Planning commissioned Professor Patrick Abercrombie to prepare an advisory plan for the future growth of Greater London. The Ministry gave its formal approval of Abercrombie's Green Belt proposals and the 1947 Town and Country Planning Act enabled local authorities to protect Green Belt land without acquiring it.

**2.18** National Green Belt policy was established in the 1955 Green Belt circular, 42/55 (MHLG, 1955). Following the establishment of Green Belt in national policy, numerous proposals were brought forward for new Green Belt around provincial towns and cities in country areas. Between 1955- 1960, no fewer than 69 sketch plans of preliminary proposals had been submitted for new Green Belt. Central government was slow in formally approving new Metropolitan Green Belt, until County Structure Plans were produced in the 1970s.

**2.19** Considerable expansion of the Metropolitan Green Belt occurred in the 1970s and 1980s, particularly in the south east of the country where there was increasing pressure from development. Councils wished to control the urban growth ('leap-frogging') that was beginning to develop just beyond the Green Belt, and consequently Green Belt became a tool to restrict the growth of towns, not just London. Central government continued to support the concept of the Metropolitan Green Belt, with emphasis on the idea that it should be an area of land approximately 20-25km wide around London, with a few fingers of restraint beyond this along some of the main communication axes.

## Green Belt in Tunbridge Wells

**2.20** The boundaries of the Metropolitan Green Belt originally approved under the development plan submissions of the 1950s did not include land within Tunbridge Wells Borough. The Green Belt around Tunbridge Wells was an extension to the original Metropolitan Green Belt, proposed by Kent County Council and formally accepted by central government following approval of the Kent Structure Plan in 1980. The precise outer boundary of the Green Belt in Kent was defined in the Kent Countryside Local Plan in 1983, for areas where they had not been defined in Town Maps. There is no Green Belt land in the adjoining county of East Sussex; the Green Belt



boundary to the south-west of TWBC is defined by the administrative boundary with Wealden District Council.

## Current Green Belt Policy

### Tunbridge Wells Borough Local Plan (2006)

**2.21** The current adopted Local Plan for Tunbridge Wells Borough (2006) contains the detailed boundaries of the Green Belt. Policy is set out in Policy MGB1 of the Local Plan and Policy CP2 of the Tunbridge Wells Borough Core Strategy 2006-2026.

**2.22** Local Plan Chapter 3 'Green Belt, Rural Fringe and Limits to Built Development' expands on the aims of Green Belt in Tunbridge Wells. Primarily, it is to protect the countryside by restricting the spread of towns, villages and hamlets; to maintain the separate identity and character of settlements and prevent their coalescence; and to assist in the renewal and regeneration of parts of the Borough's towns and villages. The policy states that "The openness of the Metropolitan Green Belt ... will be preserved and no development which would conflict with the purposes of including land within it will be permitted". This is reiterated in Policy CP2: 'Green Belt' of the Core Strategy, which states that the general extent of the Green Belt will be retained for the plan period and that "there will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it".

**2.23** Policies AL/GB1, 2 and 3 in the Tunbridge Wells Borough Site Allocations Local Plan 2016 (SALP) allocate for development land previously designated as Rural Fringe under now removed Local Plan Policy RF1. Policy AL/GB4 designates land as Rural Fringe, and in effect carries forward the Policy RF1 designation in the Local Plan for those remaining rural fringe sites that are not being allocated for development by the SALP. Policy AL/GB5 specifies Major Developed Sites (there is no material change to these sites from those previously designated in the Local Plan).

## Emerging Green Belt Policy

### Tunbridge Wells Borough Draft Local Plan, Regulation 18 Consultation (20 September to 01 November 2019)

**2.24** Green Belt policy within the emerging Local Plan is set out in Policy STR 4: 'Green Belt', which states that "The release of Green Belt land has been undertaken through this Local Plan, and is detailed where relevant in the place shaping policies in Section 5. In order to protect the remaining Green Belt, as defined on the draft Policies Map, the Council will consider the proposal against the relevant policy in the National Planning Policy Framework, or the national planning policy at the time a planning application is being determined".

**2.25** The supporting text for Policy STR4 sets out that "the Council recognises the local, regional, and national importance of the Green Belt and the important role it has, and will play, in shaping the borough. However ... the Council considers that there are the exceptional circumstances to alter the boundaries of the Green Belt to remove land from the designation for the proposed development at Tudeley Village, land at Capel and Paddock Wood, at sites around Royal Tunbridge Wells (particularly at North Farm/Kingstanding Way), and at Pembury ...".

# Chapter 3

## Green Belt Assessment Methodology

### Introduction

**3.1** This chapter sets out the methodology that was used to undertake an assessment of the harm that would result from the release of a number of development sites within the Green Belt that TWBC is considering allocating in its Draft Local Plan. Chapter 2 sets out the policy context for the study. This contextual information informed the assessment criteria and the definitions of key terms used in the Green Belt assessment set out below.

**3.2** There is no defined approach set out in national planning policy or guidance as to how Green Belt studies should be undertaken. The approach set out in this method statement is based on LUC's extensive experience of undertaking Green Belt studies.

### Assessment approach

**3.3** The Stage Two Study was a comprehensive analysis of Green Belt land within Tunbridge Wells Borough, structured around Broad Areas and Parcels identified as part of the Stage One Strategic Study. It assessed the contribution of land to the purposes of Green Belt as set out in the NPPF, which are:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**3.4** The Stage Two Study provided ratings and supporting text to assess the relative contribution of land to the Green Belt purposes.

**3.5** The assessment of harm in this Stage 3 Study combines consideration of the loss of the contribution of released land, with an assessment of the impact that the release would have on the contribution of remaining adjacent Green Belt land. Although it has drawn on the Stage Two Study's assessment of contribution, further analysis has been undertaken to identify any variations between the Stage Two parcels and the proposed development sites.

**3.6** The assessment of harm is considered as a cumulative progression out from the inset settlement edges – i.e. as an extension of an existing settlement rather than creation of a new inset area (with the exception of AL/CA1 – Tudeley Village). In this context, harm will typically increase with distance from settlement edges.

**3.7** Although the contribution to Green Belt purposes reflects the relationship between urban areas and the countryside rather than the size of a given area of land, the release of larger areas clearly has more potential to weaken the integrity of the Green Belt by extending into land that has a greater distinction from urban edges, by diminishing settlement separation and by diminishing the extent to which remaining open land relates to the wider countryside.

**3.8** The assessment considered not only the harm of release of a potential development site as a whole, but identified any significant variations in harm associated with smaller parts of it. Additionally, comments are provided on any potential for mitigation to minimise harm to the Green Belt purposes.

**3.9** Certain designations are considered an 'absolute constraint' to development, as set out within the Stage One and Stage Two studies and these areas have not be assessed within this Stage Three harm study. Absolute constraints, include the following:

- Natural constraints, including SAC, SPA, SSSI, Nature Reserves, Local Wildlife Sites, Ancient Woodland (while there is no statutory protection for ancient woodlands they are afforded a high level of protection in the NPPF) and functional floodplain (that is, flood zones 3b); and
- Cultural constraints, including Registered Parks and Gardens, and Scheduled Monuments.

**3.10** It is important to note that, although these constrained areas have not been assessed for harm in themselves, they can perform as areas of open land and/or as boundary features –

which can have a bearing on the assessment of harm that would be caused from the release of adjacent unconstrained Green Belt land.

## Harm assessment steps

**3.11** As shown in Table 3.1, the assessment of harm combines a consideration of the contribution to the Green Belt purposes of the land that will be released with an analysis of the impact that this release would have on adjacent Green Belt.

Table 3.1: Harm assessments steps

Step 1	Establish the contribution of land to the Green Belt purposes with reference to the Stage Two Study, or reconsider in the context of size and location of the allocation.
Step 2	Assess the impact of release from the Green Belt on adjacent Green Belt land.
Step 3	Assess harm to the Green Belt purposes, and potential to mitigate.

## Step 1: Establish contribution to the Green Belt purposes

**3.12** The analysis of contribution draws on the assessment carried out in the Stage Two Study, but further analysis was carried out to identify any variations in contribution that result from differences between the extent and boundaries of the assessment parcels defined in the Stage Two Study and the extent and boundaries of the proposed development sites.

**3.13** Consistent with the Stage Two Study, and with usual practice, there is no individual assessment of contribution to the fifth Green Belt purpose – assisting with urban regeneration – as it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. Therefore, an even level of contribution to Purpose 5 has been determined for Green Belt land in all draft allocations.



**3.14** Contribution to the other four Green Belt purposes is rated on a five point scale of Strong / Relatively Strong / Moderate / Relatively Weak / Weak/No contribution. Contribution is assessed with reference to three components: relevance, openness and distinction.

## Relevance

**3.15** The relevance of each Green Belt purpose is considered with reference to definitions of the different settlement types referenced in the NPPF purposes (for example large built up areas, neighbouring towns, historic towns). The definitions used in the Stage One and Stage Two studies are set out below – see Chapter 5 of the Stage One report for further details.

**3.16** The following settlements are considered to form the ‘large built-up area’ of Tunbridge Wells:

- Tunbridge Wells;
- Southborough;
- Pembury;
- Rusthall;
- Langton Green; and
- Bidborough.

**3.17** The following settlements are considered ‘towns’:

- Tunbridge Wells;
- Southborough;
- Pembury;
- Paddock Wood;
- Tonbridge.

**3.18** The following settlements are considered ‘historic towns’:

- Tunbridge Wells;
- Tonbridge.

**3.19** The degree of relevance a Green Belt purpose has to each development allocation depends on the allocation's spatial relationship with the settlement type:

- To contribute to Purpose 1, land has to be close to the large built-up area, but land which is to a degree contained by the large built-up area, where development might be considered infill, will play less of a role than land which is on its outer edge;
- The narrower the gap between towns, the stronger the relevance of Purpose 2 will be, taking into consideration the separating or connecting role of intervening physical features;
- Purpose 3 is not associated with any particular settlement type: land will be considered countryside, and Purpose 3 will therefore be relevant, unless it lacks openness. The degree of relevance may, however, be less if land has uses which give it a strong relationship with the urban area;
- For Purpose 4, relevance equates to contribution – i.e. distinction from the urban area, and to an extent openness, are not taken into account. Contribution depends on the role of land in contributing to the special character and setting of an historic town so, in contrast to Purposes 1-3, land which relates more strongly to the urban area may be likely to make a stronger contribution.

## Openness

**3.20** The NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. The presence of 'urbanising development' within the Green Belt can diminish the contribution of land to the Green Belt purposes.

**3.21** Green Belt openness relates to lack of 'inappropriate built development' rather than to visual openness; therefore, both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms. Visual openness is however still relevant when considering the degree of distinction between an urban area and the wider countryside – this is addressed below in the consideration of distinction.

## Distinction

**3.22** Under the heading ‘relationship with settlement’, the supporting analysis considers the degree of distinction between urban areas and open land – i.e. the extent to which Green Belt land has an association with the settlement rather than with the countryside. Land which has a stronger relationship with the countryside than with the urban area is considered more distinct than land which has a stronger physical association with an urban area, and will as a result make a stronger contribution to Purposes 1-3, assuming they are relevant to the land in question.

**3.23** The consideration of distinction between land within the Green Belt and developed land takes into account five interrelated elements, which are:

- Boundary features;
- Landform and land cover;
- Visual urbanising influence;
- Distance; and
- Urbanising containment.

**3.24** The Stage Two Study also considered the relationship between a land parcel and the wider countryside, with reference to the parcel’s outer boundaries, as an element of the assessment of contribution. As this relationship has a bearing on the extent to which the release of land would weaken adjacent retained Green Belt land, it is discussed at Step 2 rather than in Step 1. This means that in some instances the findings from the Stage Two Study are not directly comparable to those of this Stage Three Study. The different elements of distinction are explained further in the paragraphs below.

## Boundary features

**3.25** Some boundary features represent a stronger physical barrier than others. The following section provides an indication of the strength attributed to different types of boundary. Stronger boundary features are considered to have more permanence.

**3.26** Progressing further from the urban area, the cumulative impact of multiple boundary features will increase distinction.

### Strength of boundary features

- Strong boundary – Physical feature significantly restricts access and forms consistent edge. This could include a single strong boundary or a combination of weaker moderate boundary features (for example a main road with adjacent mature hedgerow, or a stream with adjacent linear tree cover). For example:
  - Dual carriageway;
  - Railway;
  - River/floodplain;
  - Woodland;
  - Sharp change in land form.
- Moderate boundary – Clear physical feature and relatively consistent edge, but already breached or easily crossed. This could include a combination of weak/ moderate boundary features (for example an access road with adjacent low hedgerows). For example:
  - Linear tree cover;
  - Largely continuous mature, well-treed hedgerow;
  - Main road;
  - Stream;
  - Moderate change in landform.
- Weak boundary – No clearly defined physical boundary feature, or a moderate boundary that has been breached by development. For example:
  - Regular garden/building boundaries;
  - Low/insubstantial and/or gappy hedgerows;
  - Estate/access road.

## **Landform and/or land cover**

**3.27** Landform and land cover may serve as boundary features, as indicated above, but this may extend into a broader feature which creates greater distinction, for example a woodland, lake or valley.

## **Urbanising visual influence**

**3.28** This is not concerned with the scenic quality of views, but the extent to which an absence of visual association with urban areas may increase association with the open Green Belt countryside or, conversely, the extent to which the visual dominance of urban development may increase association with the urban area. Caution is used when considering views, recognising that seasonal variations and boundary maintenance regimes can have a significant impact.

## **Distance from the urban edge**

**3.29** Even in the absence of significant boundary features, distinction from an urban area will increase with distance. Conversely, if boundary features are close together their combined impact will be diminished by lack of distance to separate them.

## **Containing influence of urban development**

**3.30** Development may to some degree contain/enclose an area of open land, thereby reducing its distinction from the urban area. Where there is substantial containment, development might be considered to constitute 'infill' rather than expansion of the urban area.

**3.31** Existing urbanising development could be located within the inset settlement or washed over by the Green Belt. In some cases, land on the fringe of an inset settlement may not currently be developed, but unless the development of such land is constrained by other factors or designations (see paragraph 3.10) the assumption is made that it will be developed, and that it therefore cannot be considered 'open'.



## Step 2: Assess impact of release on adjacent Green Belt

**3.32** Adjacent Green Belt land is defined in this study as the land that lies next to and/or in close proximity to development sites being assessed for potential release.

**3.33** In Step 2 we considered the potential impact of the release of land on the adjacent Green Belt, with the following assumptions:

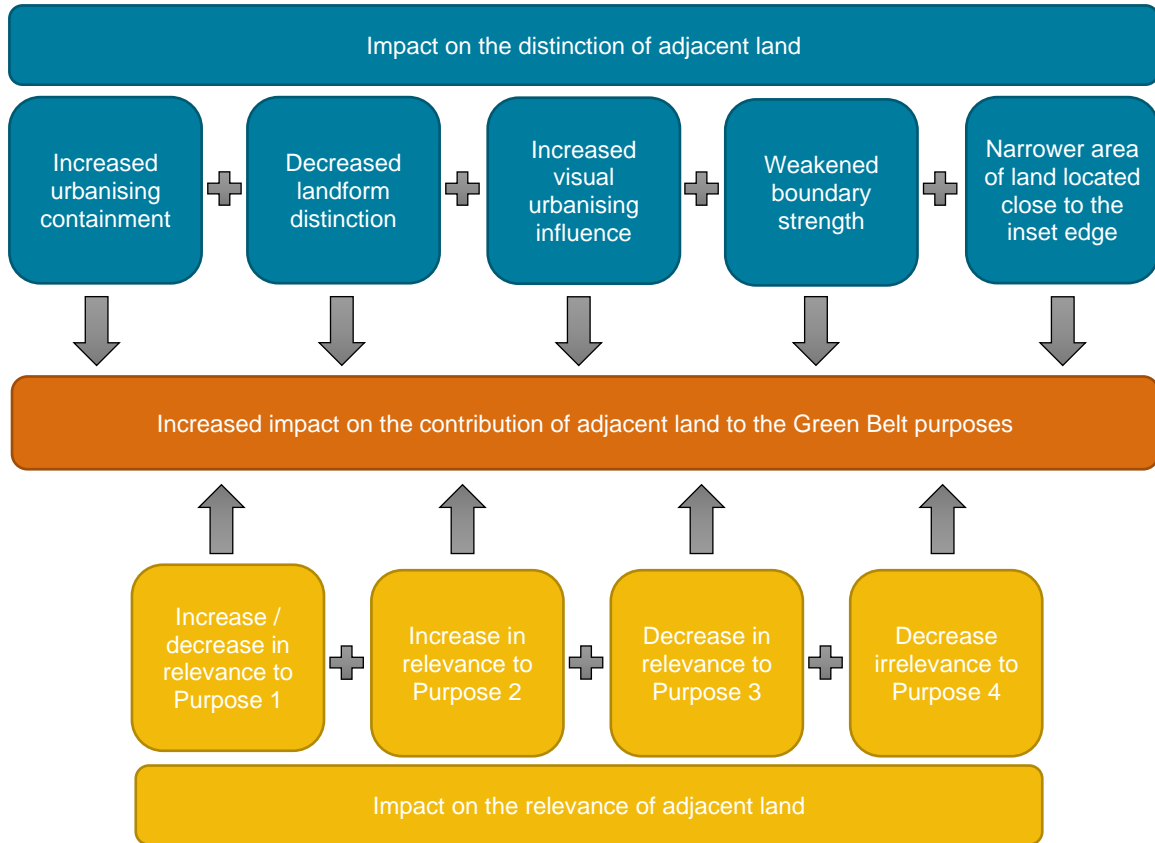
- Released land will not be open;
- Physical boundary features marking the edges of allocation sites will be retained; and
- Future development within a parcel will be of similar scale to existing development within the inset settlement edge, unless otherwise specified.

**3.34** These assumptions reflect the fact that the visual influence of urban development, and the distance Green Belt land is from that development, can both have a bearing on judgements as to whether the remaining Green Belt would be weakened. It is assumed that the land will be developed but it is recognised that there is potential for mitigation measures such as boundary strengthening and density of development and the creation of landscape buffers within a released area to influence this.

**3.35** Due to the strategic nature of this assessment and lack of detailed information currently available about future developments, this study does not include the consideration of specific mitigation proposals that may be associated with development proposals for particular sites (with the exception of masterplan documents for allocation sites AL/CA1 and AL/PW1, as described in more detail below at paragraph 3.69). This is because this information cannot be taken into account in a consistent manner for all the proposed development sites. The impact of release on adjacent Green Belt was considered with reference to two of the components of contribution listed under Step 1: distinction from inset areas and the relevance of each purpose. The release of land cannot affect the openness of adjacent, retained Green Belt.

**3.36** Figure 3.1 illustrates the elements that are considered when assessing the impact of release on adjacent Green Belt land, and the paragraphs below explain this in more detail.

Figure 3.1: Variations in impact of release on adjacent land



## Impact on distinction

**3.37** The release of land could affect the distinction of adjacent Green Belt land in a number of ways, including by:

- Weakening boundaries – e.g. a release of land crossing a strong and consistent separating feature, such as a railway line, and replacing it with a weaker boundary, such as a hedgerow, would weaken distinction (and weaken the contribution of adjacent land), but moving the Green Belt boundary to a strong and consistent separating feature would maintain the distinction of Green Belt land beyond;
- Changing landform distinction – e.g. land on a valley side which is currently distinct from a hilltop settlement could lose distinction from the urban edge if adjacent slopes are released;

- Increasing visual urban influence – land that was previously some distance from the nearest urbanising influences may be in closer proximity, particularly if there is limited visual separation;
- Leaving a narrower area of land located closer to an inset edge – for example release of land might leave a narrow field, with a clear outer boundary to the wider Green Belt, adjacent to the expanded inset area. Such an area would be less distinct from the inset area than might be the case in a more open landscape, that is where land extends a significant distance from the inset edge before reaching a clear outer boundary with the wider Green Belt.
- Increasing urbanising containment – for example land which currently faces onto inset development on one ‘front’ could become partially enclosed by if adjacent land is developed.

**3.38** The weakening of distinction of adjacent Green Belt land from the inset area by the release of a parcel of land will affect the contribution of the adjacent land to Green Belt Purposes, and therefore increase the harm of release of the parcel of land.

## Impact on relevance

**3.39** Release of land could also affect the extent to which a Green Belt purpose is considered ‘relevant’ for adjacent land, that is the potential for adjacent land to play a role with regard to each Green Belt purpose. Both increases and decreases in relevance can occur, resulting in either an increase or decrease in contribution to the Green Belt purpose, and in either case, as described below, the impact will lead to an increase in potential harm.

**3.40** However far the large built-up area expands, Purpose 1 will be relevant to adjacent Green Belt land, so land that was previously too far away from the inset edges of the large built-up area to contribute to this purpose may become close enough to play a role in preventing its further sprawl. The relevance of adjacent retained Green Belt land to Purpose 1 could also be reduced, with release of land resulting in adjacent retained Green Belt land becoming perceived as being within the large built-up area – due to greater containment.

**3.41** For Green Belt Purpose 2 – maintaining separation between settlements – the relevance of the purpose is considered to increase as the size of a settlement gap diminishes. In these circumstances, an increase in contribution to Purpose 2 will increase harm.

**3.42** The relevance of adjacent retained Green Belt land to Purpose 3 – preventing encroachment on the countryside – would rarely be affected. The release of adjacent land will not change a parcel's land use, preventing it from being considered countryside. However, release of land could result in adjacent retained Green Belt land becoming contained to the extent that it is too isolated from the wider Green Belt to be considered part of the countryside, or resulting in land uses within adjacent retained Green Belt land becoming associated with the expanding inset area.

**3.43** The relevance of adjacent retained Green Belt land to Purpose 4 – protecting the setting and special character of a historic town – could potentially be reduced by adjacent development, if that development changes the relationship between the contributing adjacent Green Belt land and the historic town. This is most likely to take the form of intervening development as a result of release of Green Belt land affecting important views, which would subsequently reduce the relevance and thus contribution of the adjacent retained Green Belt land to Purpose 4.

## **Assessing the level of impact on adjacent land**

**3.44** The contribution to Green Belt purposes of adjacent land can be weakened in the ways described above, regardless of whether the adjacent land makes a stronger or weaker contribution to the Green Belt purposes than the released parcel. However, when it comes to considering the level of harm from release of the parcel, it is only the impact on adjacent land that makes a stronger contribution to Green Belt purposes (than the land within the parcel) that affects the assessed level of harm from release of the parcel.

**3.45** This is because weaker contributing adjacent land could be released in conjunction with stronger contributing land without increasing overall harm. Therefore, if the adjacent land is being retained and not released, that cannot increase harm, even if there is an impact on the contribution of weaker performing adjacent land.

**3.46** The assessment of impact on adjacent Green Belt can therefore be seen as an assessment of additional harm, beyond that associated with the loss of contribution of released land. The assessment of impact on adjacent Green Belt will make it clear where release will have an impact on land that makes a stronger contribution to the Green Belt purposes (which could therefore increase harm) and where release will affect land which does not make a stronger contribution (and which therefore cannot increase harm).

**3.47** Impact on adjacent Green Belt is rated on a scale ranging from major to negligible. The section below provides guidance notes and examples for ratings of impact on adjacent land, but different combinations will result in different ratings. The table does not provide a comprehensive list of potential combinations.

### Factors affecting the impact of release on adjacent Green Belt land

**3.48** Major impact on adjacent Green Belt:

- The merging of inset settlements that are currently distinct would be considered a major impact, although this would be an impact on Green Belt functionality more than an impact on adjacent Green belt land; or
- A combination of moderate-major impacts.
- Example 1 – Release of land would result in the merging of Purpose 2 settlements that are currently distinct. This would be a major impact.
- Example 2 – Release would reduce a narrow gap between Purpose 2 settlements to a very narrow gap, and would also weaken the role of land which is a key element in the relationship between the settlement and key characteristics identified as contributing to special character or historic setting. Together these would be a major impact.

**3.49** Moderate-major impact on adjacent Green Belt:

- A significant change affecting a purpose of high relevance; or
- A combination of moderate impacts.

- Example 1 – Release of land would leave a gap between Purpose 2 settlements that lacks strong distinction from both settlements, and which therefore doesn't make a strong contribution to Purpose 2.
- Example 2 – Release of land would result in containment of land located adjacent to the large built-up area, such that it would now be perceived as being within the large built-up area. It would also weaken the Green Belt boundary and increase urbanising visual influence. In combination this would be a moderate-major impact, affecting contribution to Purposes 1, 2 and 3.

### **3.50 Moderate impact on adjacent Green Belt:**

- A reduction in distinction sufficient to cause a reduction in contribution by two levels (for example from strong to moderate); or
- A significant change affecting a purpose of relatively high relevance, or a very significant change to a purpose of lower relevance; or
- A combination of minor-moderate impacts.
- Example 1 – Release of land would leave only a narrow perceived gap between Purpose 2 settlements, but strong intervening Green belt land would remain.
- Example 2 – Release would diminish a parcel's contribution to the relationship between a historic town and characteristics identified as contributing to its special character or historic setting.

### **3.51 Minor-moderate impact on adjacent Green Belt:**

- A reduction in distinction sufficient to cause a reduction in contribution by one level (for example from strong to relatively strong); or
- A significant change affecting a purpose of some relevance, or some change to a purpose of higher relevance; or
- A combination of minor impacts.
- Example 1 – Release of land would increase the urbanising visual influence and containment of adjacent land. This would be a minor-moderate impact.

- Example 2 – Release of land would reduce a wide gap between towns to a more moderate gap. This would be a minor-moderate impact.

**3.52 Minor impact on adjacent Green Belt:**

- A reduction in distinction, but not enough to cause a reduction in contribution; or
- A significant change affecting a purpose of relatively low relevance, or a limited change affecting a purpose of higher relevance.
- Example 1 – Release of land would weaken the boundary separation for land that was previously further from the inset settlement area. This would be a minor impact.
- Example 2 – Land between Purpose 2 settlements which were previously considered too far apart to be ‘neighbouring’ is now considered to play some role in maintaining separation, although the gap is relatively wide. This would be a minor impact.

**3.53 Negligible impact on adjacent Green Belt:**

- Only Green Belt land that does not make a stronger contribution to any purpose would be affected by the release of land; or
- Release of land would result in negligible impact on the distinction of, and the relevance of, all Green Belt purposes of adjacent Green Belt land.
- Example 1 – Adjacent Green Belt land does not make a stronger contribution to any of the Green Belt purposes.
- Example 2 – Release of land would not significantly impact the distinction of adjacent Green Belt land or relevance of this land to Green Belt purposes. This would be a negligible impact.

## **Step 3: Assess harm to the Green Belt purposes and potential to mitigate**

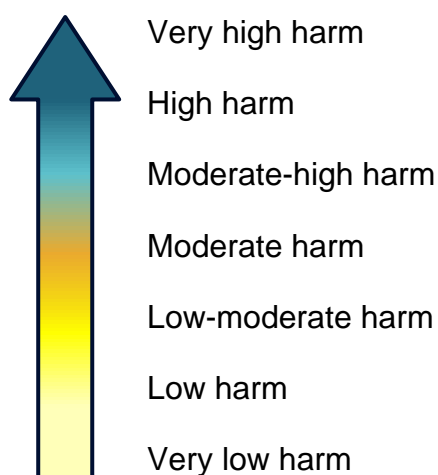
**3.54** The assessed loss of contribution of land to the Green Belt purposes (Step 1) is combined with the assessed impact of its release on remaining land designated as Green Belt (Step 2) to

determine an overall assessment of the harm of releasing land from the Green Belt for each development site.

**3.55** Where significant variations in harm have been identified within an allocation, separate sub-parcels have been identified. A minimum size limit of 1ha has been applied to this (anything less being considered too small an area to constitute a 'strategic' variation).

**3.56** The assessment also notes any potential mitigation opportunities to reduce the harm to the Green Belt through implementing measures which will help maintain the distinction between the remaining Green Belt land and urban areas. This includes reference to any mitigation measures contained within the draft policy for each allocation, and to any appropriate guidance contained in landscape character and landscape sensitivity assessments. The study only provides high level guidance on potential mitigation measures, as which measures are the most appropriate in any given locality will need to be defined in detail as part of the master-planning process. The study only provides high-level guidance on potential mitigation measures, as which measures are the most appropriate in any given locality will need to be defined in detail as part of the master-planning process (see paragraph 3.69 below). These suggestions do not alter harm ratings, as their potential impact will depend on the way in which mitigation is applied, and the timescale over which it becomes effective.

**3.57** Green Belt harm has been rated using a seven-point scale ranging from high to low harm:



**3.58** A stronger contribution to multiple purposes, very strong level of distinction from the inset settlement (resulting in a particularly strong contribution to one or more purposes) and a higher level of impact on adjacent land will typically increase harm, whilst a weaker contribution and



lower impact on adjacent land will reduce harm, but professional judgement was used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of Green Belt harm is reached. The section below provides benchmark examples of overall harm ratings, but different combinations will result in different ratings.

## **Examples used to inform the assessment of overall harm to the Green Belt purposes**

### **3.59 Very high harm to the Green Belt purposes:**

- Release of land results in a loss of strong contribution to multiple Green Belt purposes, and would constitute a moderate impact on adjacent Green Belt land – for example, reduction of separation between towns to leave only a narrow perceived gap; or
- Release of land results in a loss of strong contribution to one of the Green Belt purposes, and at least a moderate-major impact on Green Belt functionality – that is, the loss of separation between towns to the extent that any remaining intervening Green Belt land does not provide strong distinction from both settlements.

### **3.60 High harm to the Green Belt purposes:**

- Release of land results in a loss of strong contribution to multiple Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land; or
- Release of land results in a loss of strong contribution to one of the Green Belt purposes, and would constitute a moderate impact on adjacent Green Belt land.

### **3.61 Moderate-high harm to the Green Belt purposes:**

- Release of land results in a loss of strong contribution to multiple Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land; or
- Release of land results in a loss of strong contribution to one of the Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land; or
- Release of land results in a loss of relatively strong contribution to multiple Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land.

**3.62 Moderate harm to the Green Belt purposes:**

- Release of land results in a loss of relatively strong contribution to one of the Green Belt purposes, and would constitute a minor or minor-moderate impact on adjacent Green Belt land; or
- Release results in a loss of moderate contribution to multiple Green Belt purposes, and would constitute a minor or minor-moderate impact on adjacent Green Belt land; or
- Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a minor-moderate or moderate impact on adjacent Green Belt land; or
- Release of land results in a loss of strong contribution to one of the Green Belt purposes, but would constitute only a minor impact on adjacent Green Belt land.

**3.63 Low-moderate harm to the Green Belt purposes:**

- Release of land results in a loss of relatively strong contribution to one of the Green Belt purposes, but would constitute a negligible impact on adjacent Green Belt land; or
- Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land; or
- Release of land results in a loss of relatively weak contribution to multiple Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land.

**3.64 Low harm to the Green Belt purposes:**

- Release of land results in a loss of moderate contribution to one of the Green Belt purposes, but would constitute a negligible impact on adjacent Green Belt land; or
- Release of land results in a loss of relatively weak contribution to multiple Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land.

**3.65 Very low harm to the Green Belt purposes:**

- Release of land results in a loss of a relatively weak contribution to a single Green Belt purpose, and its release would have a negligible impact on adjacent Green Belt land; or
- Land makes a weak contribution to all of the Green Belt purposes.

## Potential to enhance beneficial use of remaining Green Belt land

**3.66** Paragraph 138 of the NPPF states that local planning authorities should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Furthermore, paragraph 141 of the NPPF states local planning authorities should plan positively to enhance the beneficial uses of the Green Belt. These requirements are supported by additional planning practice guidance which emphasises the need for Local Plans to include policies for compensatory improvements to the environmental quality and accessibility of the Green Belt. The PPG highlights the need for these improvements to be informed by appropriate evidence on issues such as green infrastructure, woodland planting, landscape, biodiversity, habitat connectivity and natural capital, access and recreation.

**3.67** It is therefore important that the Councils consider where and how the Green Belt can be enhanced, particularly the relationship between the preferred sustainable pattern of development and the designations' potential for new and improved appropriate uses.

**3.68** To this end we have provided high-level comments on potential beneficial use, reviewing the existing measures contained within the draft policy for each allocation. In doing this we make reference, where relevant, to existing studies, such as Landscape Character Assessments, Landscape Sensitivity Assessment, Historic Environment work, Green Infrastructure Strategies, and the biodiversity evidence base.

## Consideration of draft masterplan documents

**3.69** AL/CA1: Tudeley Village and AL/PW1: Land at Paddock Wood are significantly larger than the other proposed allocations, and this assessment process has also found that they would result in a higher level of harm than other draft allocations. Subsequent to the draft assessment findings, TWBC requested that LUC review the latest masterplan documents for these two allocation sites, to provide commentary on the potential for the development proposals to mitigate harm. The masterplans are evolving documents, subject to change. The versions that were reviewed are included at Appendix A.

# Chapter 4

## Draft Allocation Sites Harm Assessment

### Introduction

**4.1** This section presents the harm assessment for each draft allocation site, the locations of which are shown on Figure 4.1: Draft Allocation Sites.

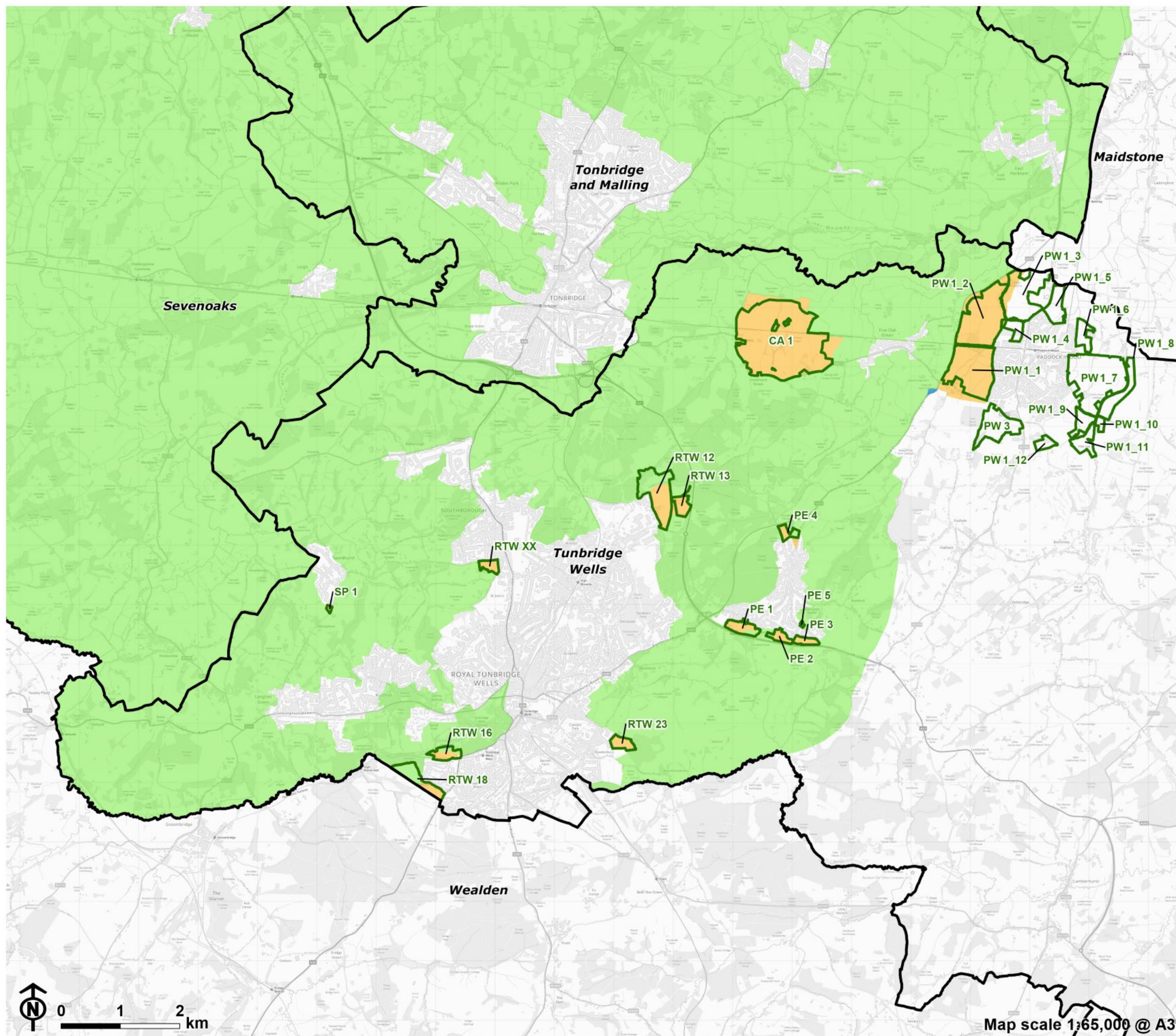
**4.2** For each allocation site the assessment includes:

- An OS map showing the location of the allocation site, any identified absolute constraints and/or any additional potential constraints, the relevant Green Belt Parcels and/or Broad Areas from the 2017 Green Belt Study (Stage Two), and any identified variations in the assessed level of harm.
- Allocation Summary: a brief description of the allocation site and any identified constraints.
- Contribution to the Green Belt Purposes:
  - An analysis of distinction from the urban area, under the heading ‘Relationship with settlement’.
  - A summary of the contribution to each Green Belt purpose, with reference to: the relevance of the purpose, openness, and the degree of distinction from the urban area.
- Impact on adjacent Green Belt land: analysis of effect of release on distinction and on relevance of purposes.
- Harm summary:
  - Overall harm to the Green Belt purposes, stating loss of contribution to the Green Belt purposes (with reference to the 2017 Green Belt Study Stage Two findings and the site-specific appraisal set out above), impact on adjacent Green Belt and overall harm rating.
  - Identification of any variations in harm associated with parts of the allocation’s release area.

- A high-level description of potential mitigation measures. As noted, these mitigation suggestions do not alter harm ratings, as their potential impact will depend on the way in which mitigation is applied, and the timescale over which it becomes effective.
- Potential to enhance beneficial use: a high-level description of potential to enhance beneficial use of remaining Green Belt land.



**Figure 4.1: Draft Allocation Sites**

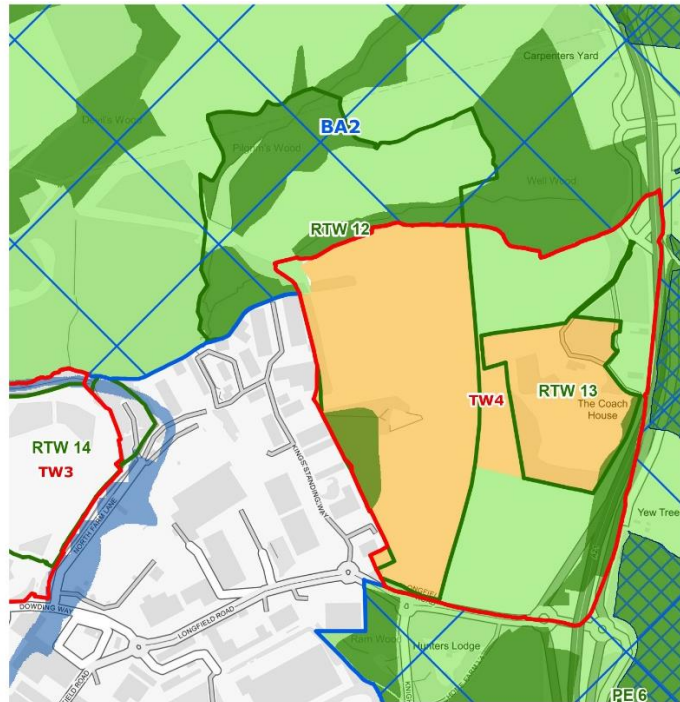


- District boundary
- Draft Local Plan allocation
- Green Belt
- Land released from Green Belt
- Land added to Green Belt



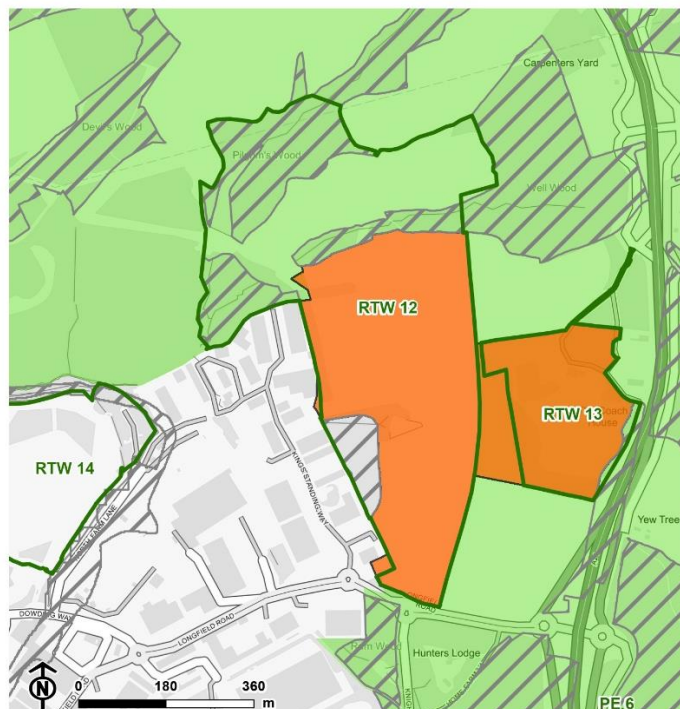
## AL/RTW12: Land adjacent to Longfield Road

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings

## Allocation Summary

**4.3** AL/RTW12 abuts the eastern edge of the existing limits to built development (LBD) of Tunbridge Wells, which comprises large-scale business and retail development located along Kingstanding Way. The allocation site occupies land which gently rises to the east and comprises open pasture interspersed with woodland blocks and woodland belts. It is defined to the north by blocks of Ancient Woodland, including Pilgrim's Wood and Well Wood; to the east by an access track and agricultural fencing, separating it from further fields and from allocation AL/RTW13; to the south by the A228 and associated mature hedgerow; and to the west by woodland belts and a block of Ancient Woodland (King's Standing), which together provide some separation from the urban area. The woodland within and on the periphery of the allocation site results in a strong level of physical and visual containment from the surrounding landscape. The allocation site lies entirely within the AONB.

**4.4** The area to be removed from the Green Belt is approximately 20ha in size. This is consistent with the allocation site boundary to the south, east and west, but land in the northern part of the allocation, beyond Prowles Gill (Ancient Woodland), is to be retained within the Green Belt for landscape and ecological mitigation purposes.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.5** Mature woodland (including King's Standing Ancient Woodland) and woodland belts form a clear boundary feature, tree cover and a gently rising terrain providing some additional distinction, and the site extends a significant distance from the inset edge. The allocation is not contained by urban development, but the site's location adjacent to the urban area and large-scale development on Kingstanding Road means that the urban area dominates views.

### Purpose 1: checking the sprawl of the large built up area

**4.6** The land is open and is adjacent to the large built up area of Tunbridge Wells. It has a relatively strong degree of distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area,



the greater the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Relatively Strong contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.7** The land lies in a wide gap between Tunbridge Wells and Pembury, with extensive woodlands on higher ground to the east and the A21 providing strong separating features. It therefore makes a Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.8** The land is countryside, is also open and has a relatively strong distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Relatively Strong contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.9** The land lies adjacent to the industrial edge of Tunbridge Wells and lacks a relationship with the historic town centre and is atypical in that the edges of the town that are for the most part on high ground. It forms a minor element in the historic setting of Tunbridge Wells, and therefore makes a Relatively Weak contribution to preserving the setting and special character of Tunbridge Wells.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.10** All Green Belt land is considered to contribute equally to this purpose.

## **Impact on adjacent Green Belt land**

**4.11** The proposed release within AL/RTW12 will extend the inset edge (draft LBD) only slightly further north from the existing LBD, with the area to be released defined to the north by a strong

belt of Ancient Woodland (Prowles Gill). The presence of this strong boundary feature, along with the northern area of the allocation (north of Prowles Gill) to be used for landscape and ecological mitigation, will limit any potential impact on adjacent Green Belt land to the north.

**4.12** Whilst AL/RTW12 will extend the urban area further east, the A228 and A21 and will form strong Green Belt boundaries to the south and east respectively. These strong boundary features will limit any potential impact on adjacent Green Belt land to the south and east. Furthermore, the existing woodland cover on land to the south and east will maintain a strong distinction from the inset area in terms of land cover and views.

**4.13** The overall level of impact on adjacent Green Belt resulting from the release of AL/RTW12 will be Negligible.

**4.14** Land to the east of AL/RTW12, outside of the neighbouring allocation AL/RTW13, makes only a minimally stronger contribution to the Green Belt purposes, being likewise contained by the A21 and having no boundary features to create separation from the allocation. Any impact on this land will not therefore increase overall harm.

## Harm summary

**4.15** AL/RTW12 makes a Relatively Strong contribution to checking the unrestricted sprawl of the large built-up area and to preventing encroachment on the countryside, and a Relatively Weak contribution to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/RTW12 will be Moderate.

**Moderate**

## Variations in harm

**4.16** No variations in harm are identified within AL/RTW12.

## Potential mitigation measures

**4.17** The Draft Policy RTW/12 includes requirements for the layout, form and massing of built development to have regard for the topography, existing hedgerows and mature trees, Ancient

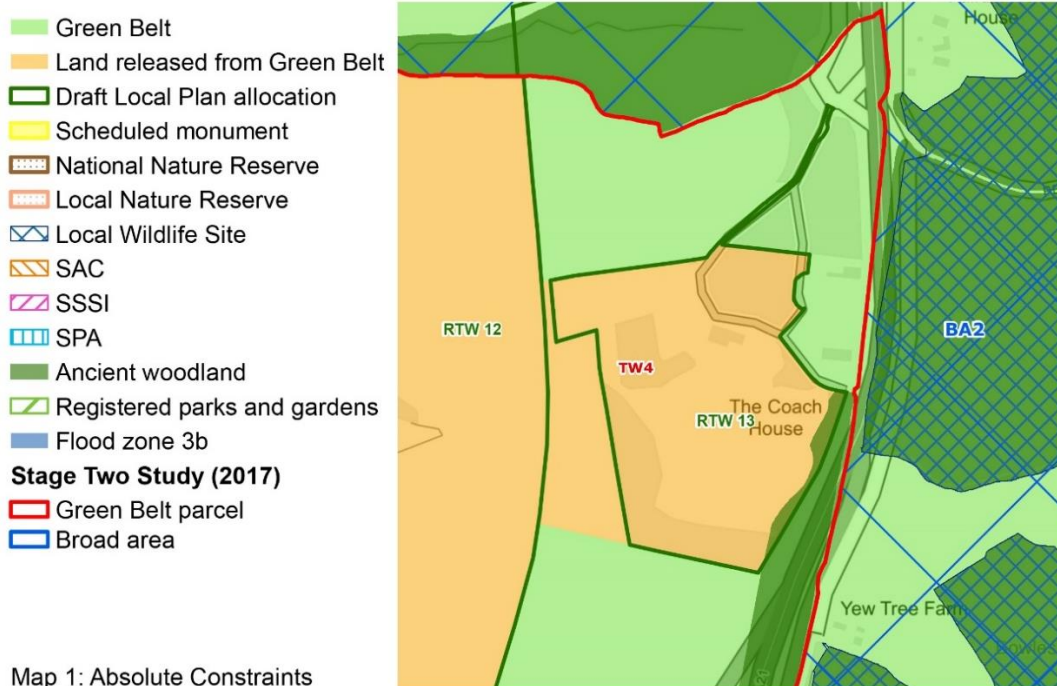
Woodland, and landscape and visual impact of development; and for no built development to be located within the areas indicated for open space and buffers (to the north, west (Kings Standing) and south-east.

**4.18** Other potential mitigation measures could include the further enhancement of the eastern boundary of the site (in addition to the areas indicated for open space and landscape buffers to the south-east), using locally characteristic hedgerow and woodland planting. These measures would strengthen the new Green Belt boundary, would help to reduce any potential visual influence of development on adjacent Green Belt land to the east and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 14 Pembury/Capel (Forested Plateau) of the TWB LCA (2017).

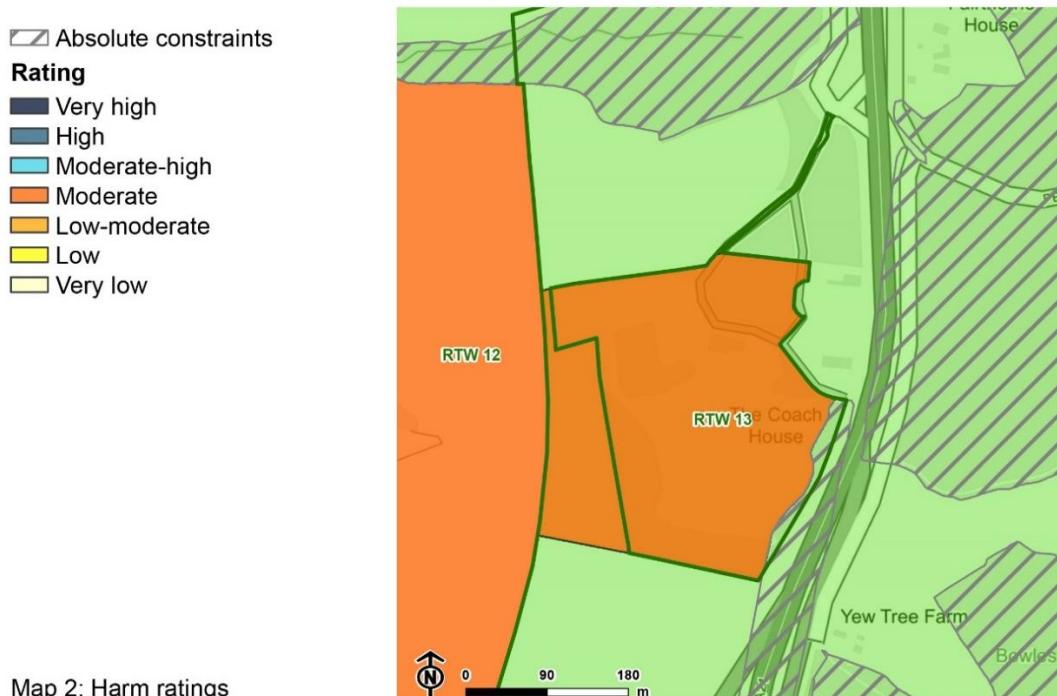
## **Potential to enhance beneficial use**

**4.19** The wording for Draft Policy AL/RTW 12 includes for the provision of links from the site to existing cycle routes and pedestrian networks including PRoW; and the provision of improvements to the environmental quality and accessibility of remaining Green Belt land adjacent to the site, including net gains to biodiversity. These measures would be in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

## AL/RTW13: Land at Colebrook House, Pembury Road



Map 1: Absolute Constraints



Map 2: Harm ratings

## Allocation Summary

**4.20** AL/RTW13 is located approximately 250m to the west of the existing LBD of Tunbridge Wells, where large-scale business and retail development is located on Kingstanding Road. AL/RTW 13 is contiguous with AL/RTW12 to the west, which lies between it and the existing LBD. The eastern boundary of AL/RTW 13 is formed by a belt of remnant Ancient Woodland adjacent to the A21 and recent landscape planting associated with Fairthorne junction; its southern and western boundaries by mature woodland blocks; its north-western boundary by a hedgerow separating it from a series of open fields; and its north-eastern boundary by mature woodland surrounding Colebrooke House. A linear section of the allocation also extends along a private access track connecting with Pembury Road to the north-east.

**4.21** The allocation covers former parkland associated with the Colebrooke Park estate and predominantly comprises open grassland with scattered mature trees surrounded by mature woodland. The woodland on the periphery of the site results in a strong level of physical and visual containment from the surrounding landscape. Colebrooke House is located centrally within the allocation with some associated outbuildings and hard-standing to the east and north-west. The allocation site lies entirely within the AONB.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.22** Although the A21 and the Fairthorne junction can be considered to have some containing urbanising influence, the site has a strong distinction from the inset edge of Tunbridge Wells. It is located a significant distance from the inset edge, with intervening tree cover creating strong boundary separation and minimising urban visual influence. Tree cover within the allocation, and the elevation difference between the lower-lying urban edge and the allocation site, add to the sense of separation.

### Purpose 1: checking the sprawl of the large built up area

**4.23** The land is considered open in Green Belt terms – Colebrooke House is not of a scale or form to have an urbanising influence. Whilst it has a relationship with the large built-up area of

Tunbridge Wells due to its close proximity it also has relatively strong distinction from the inset area, with characteristics which make it distinct from Tunbridge Wells. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Relatively Strong contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.24** The land lies in a wide gap between Tunbridge Wells and Pembury, with extensive woodland cover on higher ground to the east and the A21 providing strong separating features. It therefore makes a Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.25** The land is in a countryside location and is open. It has relatively strong distinction from the inset area, with characteristics which make it distinct from Tunbridge Wells. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Relatively Strong contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.26** The land lies in proximity to the industrial edge of Tunbridge Wells and lacks a relationship with the historic town centre and is atypical in that the edges of the town that are for the most part on high ground. It forms a minor element in the historic setting of Tunbridge Wells, and therefore makes a Relatively Weak contribution to preserving the setting and special character of Tunbridge Wells.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.27** All Green Belt land is considered to contribute equally to this purpose.

## Impact on adjacent Green Belt land

**4.28** It is assumed that AL/RTW12 will also be released, with the result that AL/RTW13 would form extension to Tunbridge Wells rather than forming a separate inset area.

**4.29** The physical and visual enclosure provided by the mature woodland within and adjacent to the allocation site, including that to be retained for open space and landscape buffers to the east and south of the site, will limit any potential impact on stronger Green Belt land to the north of the Well Wood and Prowles Gill Ancient Woodlands, and the A21 provides a strong boundary to the wider Green Belt to the east.

**4.30** The overall level of impact on adjacent Green Belt resulting from the release of AL/RTW13 will be Negligible.

**4.31** Land immediately to the north and south of AL/RTW13 has weaker physical and visual distinction from the large-scale commercial developments that form the urban area to the west, and so does not make a stronger contribution to any of the Green Belt purposes.

## Harm summary

**4.32** AL/RTW13 makes a Relatively Strong contribution to checking the unrestricted sprawl of the large built-up area and to preventing encroachment on the countryside, and a Relatively Weak contribution to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/RTW13 will be Moderate.

**Moderate**

## Variations in harm

**4.33** No variations in harm are identified within AL/RTW13.

## Potential mitigation measures

**4.34** Draft Policy RTW/13 includes for: the layout and design to have regard for the topography, existing trees, mature hedgerows on site and the landscape and visual impact of development;



the need to retain and enhance the formal landscaping of the site; and the need for proposals to be based on detailed studies of the parkland landscape with the clear objective of protecting and enhancing landscape character and conserving notable landscape features. Other potential mitigation measures could include the introduction of locally characteristic woodland planting to the north-west of the site to strengthen the boundary and reduce any potential visual influence of development on adjacent Green Belt land to the north.

**4.35** These measures would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 14 Pembury/Capel (Forested Plateau) of the TWB LCA (2017).

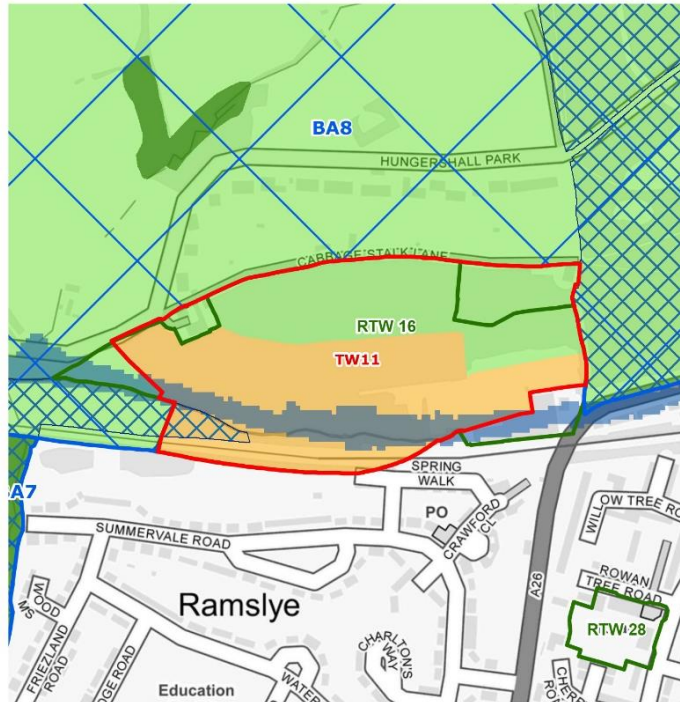
### **Potential to enhance beneficial use**

**4.36** The wording for Draft Policy AL/RTW 13 includes for the provision of pedestrian and cycle links from the site to existing cycle routes and pedestrian networks including PRoW; and the provision of improvements to the environmental quality and accessibility of land adjacent to the site remaining within the Green Belt, including through opportunities to increase net gains to biodiversity. These measures would be in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).



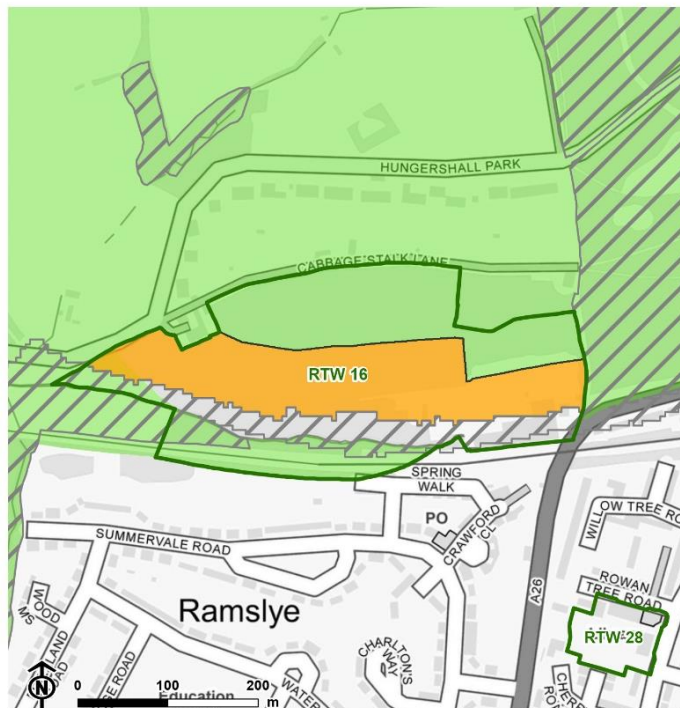
## AL/RTW16: Land at Wyevale

- Green Belt
  - Land released from Green Belt
  - Draft Local Plan allocation
  - Scheduled monument
  - National Nature Reserve
  - Local Nature Reserve
  - Local Wildlife Site
  - SAC
  - SSSI
  - SPA
  - Ancient woodland
  - Registered parks and gardens
  - Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
  - Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
  - High
  - Moderate-high
  - Moderate
  - Low-moderate
  - Low
  - Very low



Map 2: Harm ratings

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## Allocation Summary

**4.37** AL/RTW16 is located on the northern edge of the suburb of Ramslye in Tunbridge Wells, abutting the existing LBD. It is an irregularly-shaped parcel of land defined to the north by Cabbage Stalk Lane, beyond which lies a row of washed-over houses (Hungershall Park); to the south by the River Grom and associated floodzone 3b, beyond which the Spa Valley Railway extends east-west on raised embankment; to the north-west by High Rocks Lane, beyond which lies Nevill Park; to the south-west by a hedgerow running between High Rocks Lane and the railway; to the east by mature woodland lying within Tunbridge Wells Common; and to the south-east by Eridge Road (A26).

**4.38** The allocation site covers land associated with a former nursery and the extant Tunbridge Wells Garden Centre. It comprises a mixture of remnant formal planting and scrub vegetation, with some patches of open ground located on the valley floor and lower northern slopes of the Grom valley to the west. The south-east of the allocation features a garden centre and car washing facility, and a large area of associated hard-standing which only fall partly within the Green Belt. The eastern boundary and part of the northern boundary of AL/RTW16 are contiguous with the Tunbridge Wells Conservation Area; and the eastern boundary abuts Tunbridge Wells Common.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.39** The allocation site has a strong distinction from the inset edge of Tunbridge Wells. This is a factor predominantly of the strong boundary features formed by the railway and A26; and the tree cover and valley form of the River Grom being significantly different to the inset area. The land also extends a reasonable distance from the inset edge and has a degree of urban containment owing to the presence of development in Ramslye to the south, washed-over development at Hungershall Park to the north and the inset area of Nevill Court further to the north-west. Considering both the visual enclosure provided by woodland cover within and adjacent to the site, as well as the presence of urbanising development washed over by the Green Belt, neither the countryside nor the urban area dominates views.

### **Purpose 1: checking the sprawl of the large built up area**

**4.40** The allocation site is predominantly open, and in a localised context it has relatively strong distinction from the inset settlement. However, in the wider context it forms part of an area that is largely contained by urban development, meaning that development here would not constitute outward expansion of the town. It therefore makes a Moderate contribution to checking the sprawl of the large built up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.41** The land does not lie between neighbouring towns, and therefore makes No contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.42** The land comprises countryside and washed over development within the countryside, is predominantly open and has a relatively strong distinction from the inset area. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Relatively Strong contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.43** The land lies alongside the Common, which is a key element in the historic setting of the town centre, and the open Grom valley to the west is an important historic approach route. However, containment by existing residential properties to the north and south and the current garden centre usage reduce the land's significance in regard to Purpose 4. It therefore makes a Relatively Weak contribution to preserving the setting and special character of Tunbridge Wells.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.44** All Green Belt land is considered to contribute equally to this purpose.

## Impact on adjacent Green Belt land

**4.45** As part of Policy AL/RTW16 the Green Belt land to the south of the allocation along the railway line is to be removed, with the new Green Belt boundary pulled back further west. The reason for this is prevent what would otherwise be an anomalous thin sliver of land remaining in the Green Belt. With this, only the adjacent land to the north, east and west of the allocation will fall within the Green Belt.

**4.46** The release of AL/RTW16 will extend the inset boundary slightly further north. This will replace an existing strong Green Belt boundary (the railway line and A26) with another strong boundary (retained woodland belts to act as landscape buffers), but one with less consistency than the existing valley floor boundary.

**4.47** For land close to the new inset boundary to the west and north-west there will be a very slight increase in urban containment (it will lie partly between the allocation site and the inset areas of Nevill Court to the north-west; and between the allocation site and Ramslye to the south-west). However, this will not lower its current overall strong distinction from the inset settlement.

**4.48** The physical and visual enclosure provided by the mature woodland cover within Tunbridge Wells Common immediately adjacent to AL/RTW16, along with the proposed landscape buffer to the north-east of the site, will limit any potential impact on adjacent strongly distinct Green Belt land to the east.

**4.49** The overall level of impact on adjacent Green Belt resulting from the release of AL/RTW16 will be Negligible.

## Harm summary

**4.50** AL/RTW16 makes a Relatively Strong contribution to the prevention of encroachment on the countryside and a Moderate contribution to checking the unrestricted sprawl of the large built up area and to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/RTW16 will be Low-Moderate.

**Low-Moderate**

### **Variations in harm**

**4.51** The south-eastern parts of AL/RTW16 (that currently occupied by the garden centre and car wash facilities), due to its reduced openness, makes a Moderate contribution to Purpose 3 and a Relatively Weak contribution to Purpose 1. Its release will breach the existing consistent boundary formed by the railway line and valley floor, meaning that the impact associated with the release of this area is minor and the harm rating is Low.

### **Potential mitigation measures**

**4.52** Draft Policy AL/RTW16 includes for regard to be given to existing hedgerows and mature trees on site, with the layout and design to protect those of most amenity value; and suitable buffering to the setting of the adjacent Tunbridge Wells and Rusthall Common. No measures over and above those included within the Regulation 18 draft policy wording for Policy AL/RTW16 are considered necessary.

**4.53** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 5 Speldhurst (Wooded Farmland) of the TWB LCA (2017).

### **Potential to enhance beneficial use**

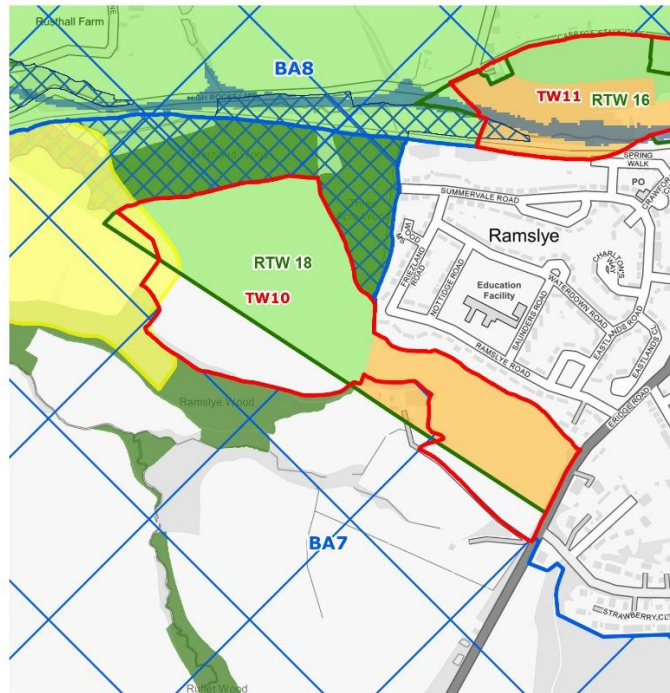
**4.54** Draft Policy AL/RTW16 includes for the provision of areas of green space to remain within the Green Belt, with a management plan provided in perpetuity; and the provision of a green route east-west through the allocation site, enhancing connectivity to existing PRoW on Tunbridge Wells Common and Cabbage Stalk Lane. These measures would increase public access to remaining Green Belt land and would help deliver improved Green Infrastructure, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019); and would improve accessibility to Tunbridge Wells Common, in accordance with the landscape strategy for LCA 5 ‘Speldhurst Wooded Farmland’ (TWB LCA, 2017). In addition, draft Policy AL/RTW16 includes for suitable buffering and enhancements to the River

Grom corridor, which would help deliver potential net biodiversity gains, in accordance with the GI Framework.



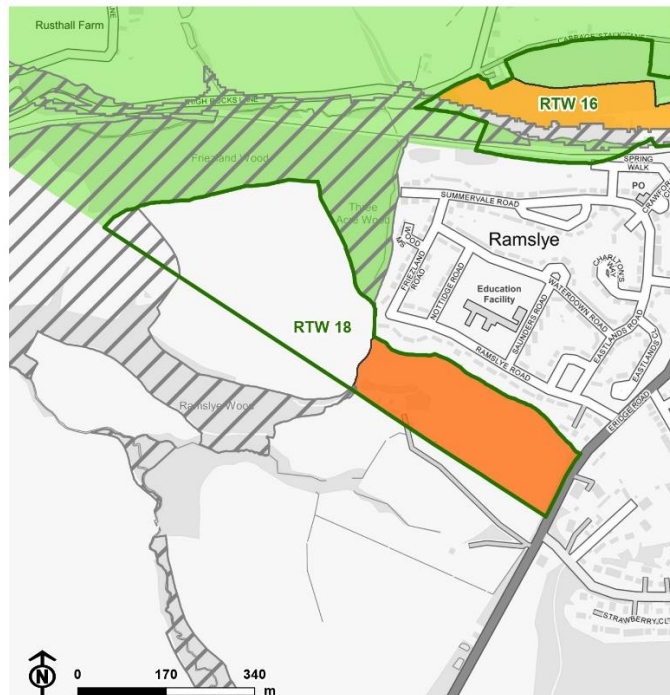
## AL/RTW18: Land to the west of Eridge Road at Spratsbrook Farm

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings

## Allocation Summary

**4.55** AL/RTW18 comprises two assarted areas of open arable land, located on the western edge of Tunbridge Wells. The allocation site is defined to the south largely by the administrative boundary with Wealden District Council, which in this location crosses open arable land and does not correspond with any physical features on the ground. The southern boundary excludes the buildings of Ramslye Farm and adjacent wooded areas.

**4.56** The southern-eastern half of the allocation site abuts the existing LBD and is defined on its northern edge by the rear gardens of properties on Ramslye Road; and to the east by Eridge Road (A26), beyond which lies the suburb of Broadwater Down. The north-western half of the allocation comprises north-facing sloping land and is defined to the north by Ancient Woodland, which includes Friezland Wood and Three Acre Wood (this wooded area is also covered by Friezland Wood LWS), and to the west by a hedgerow connecting Friezland Wood with Ramslye Wood (Ancient Woodland), which is located beyond the southern boundary of the allocation site. The north-western part of the allocation site falls within the AONB, High Rocks Hillfort (Scheduled Monument) lies partly within the allocation site to north-west, and the eastern boundary of AL/RTW18 is contiguous with Tunbridge Wells Conservation Area.

**4.57** Only the south-eastern half of the allocation site is to be removed from the Green Belt under Policy AL/RTW18; the north-western half will be retained in the Green Belt for use as green space.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.58** There are differences in the relationship between the urban edge and the south-eastern and north-western halves of the parcel, however the focus here is on the south-eastern half of the allocation as only this is to be released from the Green Belt.

**4.59** Rear gardens of residential properties form weak boundary features, the land does not extend far from the inset edge and the land also has a degree of urban containment owing to the presence of inset development in Ramslye to the north and Broadwater Down to the east.



However, the landform slopes away from the inset area, creating some landform distinction, and neither the countryside nor the urban area dominates views.

**4.60** The area around Ramslye Farm, which is to be released but is outside of the allocation site, has a stronger distinction from the inset edge in terms of landform/cover and views, although this is still moderate overall.

### **Purpose 1: checking the sprawl of the large built up area**

**4.61** The land to be released is adjacent to the large built up area of Tunbridge Wells, is open and has a moderate distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Moderate contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.62** Land does not lie between neighbouring towns so it makes No contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.63** The land comprises open countryside, and has a moderate distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Moderate contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.64** The openness of the north-western half of the allocation site contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting. However, the land to be released to the south-east is adjacent to the inset edge which creates a stronger urbanising influence, albeit it does make some contribution to the setting of the adjoining conservation area at Broadwater Down. The land to be released

therefore makes a Moderate contribution to preserving the setting and special character of historic towns.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.65** All Green Belt land is considered to contribute equally to this purpose.

### **Impact on adjacent Green Belt land**

**4.66** As part of Policy AL/RTW18, only the south-eastern half of the allocation is to be removed from the Green Belt; the north-western half will be retained in the Green Belt for use as green space. The release will extend over Ramslye Farm (not within the allocation) to follow the Borough and County boundary to the south. Therefore, only the adjacent land to the north-west will be within the Green Belt (land within AL/RTW18). Land to the south and south-west, in East Sussex, does not lie within the Green Belt, so release of this area would leave no Green Belt buffer, but that is already the case along most of the southern edge of Tunbridge Wells and so is not considered an adverse impact on the Green Belt purposes.

**4.67** The release of the south-eastern part of AL/RTW18 will extend the inset edge further south to the District boundary. This will slightly increase the extent of urban edge frontage to land immediately to the north-west (land within AL/RTW18), but not enough to cause any significant urbanising containment or visual impact.

**4.68** The overall level of impact on adjacent Green Belt resulting from the release of AL/RTW18 will be Negligible.

### **Harm summary**

**4.69** The area of AL/RTW18 to be released makes a Moderate contribution to checking the unrestricted sprawl of the large built up area, to the prevention of encroachment on the countryside and to preserving the special character and setting of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/RTW18 will be Low-Moderate.

**Low-Moderate**

### **Variations in harm**

**4.70** No variations in harm are identified within AL/RTW18.

### **Potential mitigation measures**

**4.71** Draft Policy AL/RTW18 includes for the layout, form and mass of built development to have regard for the topography, trees, hedgerows and Ancient Woodland; the potential requirement for a buffer to development to the Scheduled Monument; and for the provision of a soft landscape buffer along the south-western boundary. Other potential mitigation measures could include the introduction of locally characteristic woodland or hedgerow planting to the north-west of Ramslye Farm (between the north-western and south-eastern halves of AL/RTW18).

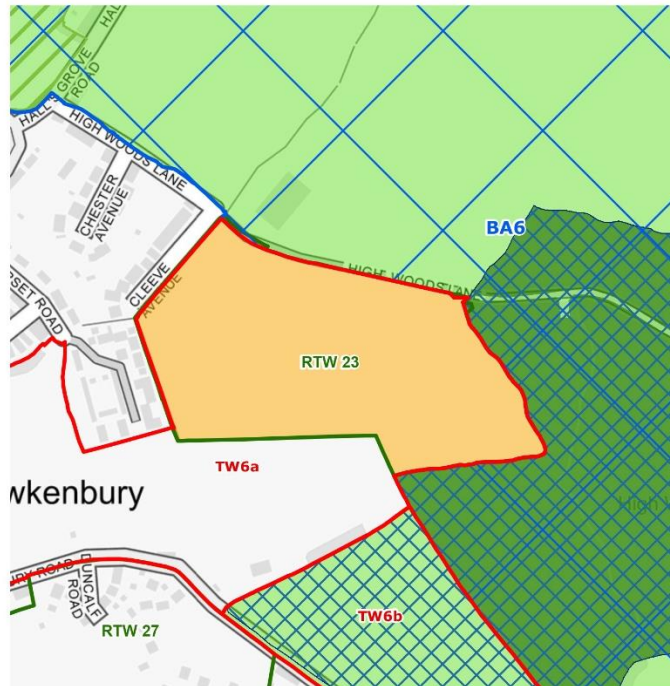
**4.72** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 5 Speldhurst (Wooded Farmland) of the TWB LCA (2017).

### **Potential to enhance beneficial use**

**4.73** Draft Policy AL/RTW18 includes for the provision of links from the site to the existing PRoW and pedestrian and cycle links to the adjacent Ramslye Estate; the need to demonstrate a positive contribution to Biodiversity Opportunity Area targets; and the provision of publicly accessible open space and recreation. These measures would increase public access to remaining Green Belt land and would help deliver improved Green Infrastructure and potential biodiversity net gains, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

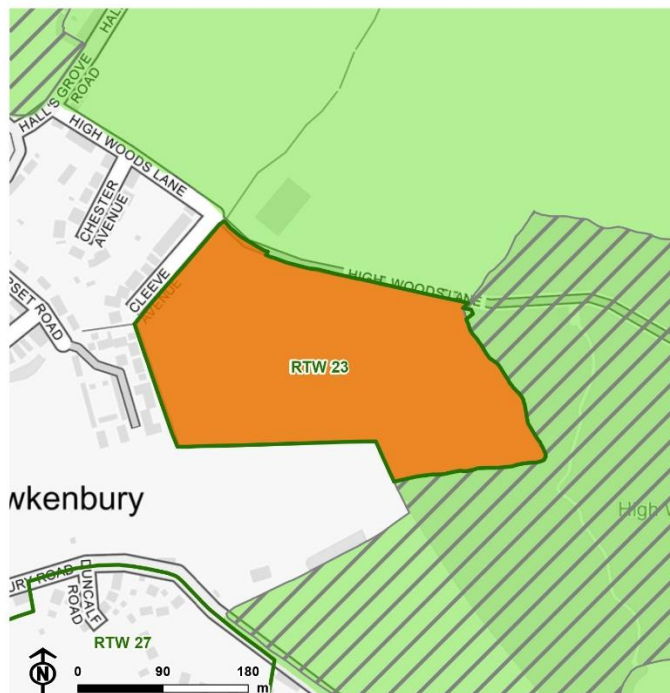
## AL/RTW23: Land to the north of Hawkenbury Recreation Ground

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings

## Allocation Summary

**4.74** AL/RTW23 is located on the eastern edge of Hawkenbury, abutting the existing Tunbridge Wells LBD on its eastern and south-western boundaries. It comprises an assorted arable field and is defined to the east and south-east by High Wood (Ancient Woodland and LWS); to the north by High Woods Lane (including Tunbridge Wells Circular Walk recreational route), beyond which lies further arable fields, Hawkenbury allotments and a washed-over indoor bowls club; to the south-west by a hedgerow with occasional mature trees separating it from Hawkenbury Recreational Ground, which lies within the LBD; and to the west by the rear gardens of properties on Sherborne Close and Cleeve Avenue and associated hedgerow. The landform rises gradually from west to east, with High Wood occupying the crest of a hill. The allocation site lies entirely within the AONB.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.75** The rear gardens of residential properties on Sherborne Close and Cleeve Avenue form weak boundary features; and landform and landcover do not increase distinction from the inset edge. However, the land is not contained by urban development and extends a reasonable distance from the inset area, meaning neither the countryside nor the urban area dominates views.

### Purpose 1: checking the sprawl of the large built up area

**4.76** The land is open and is adjacent to the large built up area of Tunbridge Wells. It has a moderate degree of distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Moderate contribution to checking the sprawl of the large built-up area.

## **Purpose 2: preventing neighbouring towns merging**

**4.77** Land does not lie between neighbouring towns, so it makes No contribution to preventing neighbouring towns merging.

## **Purpose 3: safeguarding the countryside from encroachment**

**4.78** The land is countryside, is also open and has a moderate distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Moderate contribution to safeguarding the countryside from encroachment.

## **Purpose 4: preserving the setting and special character of historic towns**

**4.79** The parcel's openness contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting. The allocated land is also an element in views from Dunorlan Park (a Registered Park and Garden) of the open ridgeline forming the foreground to High Wood. However, due to it being contained by High Woods, the area has a strong relationship with the urban area. It therefore makes a Moderate contribution to preserving the setting and special character of historic towns.

## **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.80** All Green Belt land is considered to contribute equally to this purpose.

## **Impact on adjacent Green Belt land**

**4.81** The release of AL/RTW23 will replace an existing weak boundary feature (hedgerow to the north of Hawkenbury Recreational Ground) with a slightly stronger boundary (High Woods Lane) that will serve to mark the transition from the area contained by High Wood (that is, AL/RTW23) to the more exposed slopes to the north. Despite this, there will be a slight increase in visual association with the urban area and a weakening of boundary distinction for land in proximity to the new inset boundary to the north and north-east. However, overall, the remaining



Green Belt land to the north and north-east will retain its current strong distinction from the settlement edge, owing predominantly to its sloping landform and lack of urban containment.

**4.82** The release of AL/RTW23 will extend the inset boundary further east, albeit to a stronger boundary feature (High Wood) than that which currently defines the LBD (garden boundaries and Cleeve Avenue). Policy AL/RTW23 also includes for a landscape buffer to the east and south-east of the allocation, adjacent to High Wood, which will further strengthen this boundary. The strong physical and visual containment provided by High Wood would limit the potential impact on land in BA6 to the east and south-east.

**4.83** The overall level of impact on adjacent Green Belt resulting from the release of AL/RTW23 will be Minor.

## Harm summary

**4.84** AL/RTW23 makes a Moderate contribution to checking the unrestricted sprawl of the large built up area, to the prevention of encroachment on the countryside and to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Minor. Harm resulting from the release of AL/RTW23 will be Moderate.

**Moderate**

## Variations in harm

**4.85** No variations in harm are identified within AL/RTW23.

## Potential mitigation measures

**4.86** Draft Policy AL/RTW23 includes for regard to be given to existing hedgerows and mature trees on site, with the layout and design of the development protecting those of most amenity value. Other potential mitigation measures could include enhancement of the northern boundary of the site along High Woods Lane with locally characteristic planting.

**4.87** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land to the north and north-east and would help to integrate development

into the landscape, in accordance with the landscape strategy for LCA 19 Bayhall (Open Farmland) of the TWB LCA (2017).

## **Potential to enhance beneficial use**

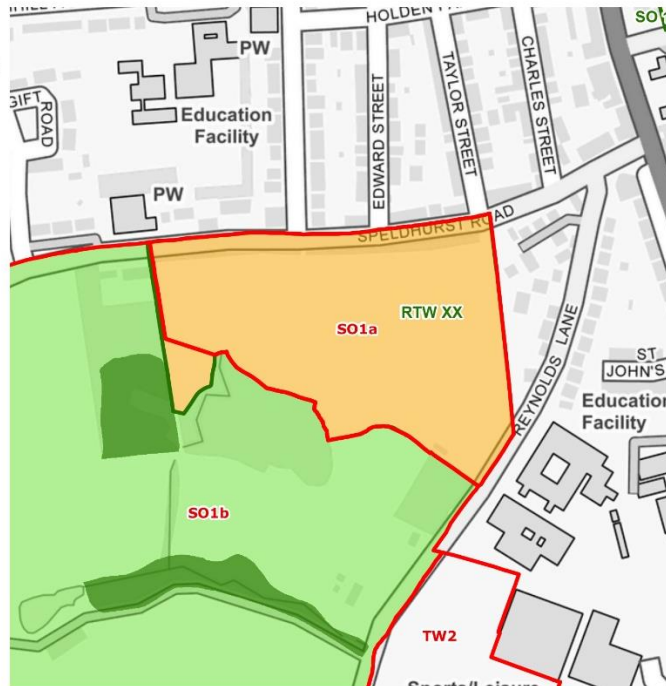
**4.88** Draft Policy AL/RTW23 includes for the provision of improved cycle and pedestrian linkages. Other potential measures that could enhance beneficial use of remaining Green Belt land could include the appropriate woodland management of High Wood to maximise ecological, landscape and recreational benefits, in line with the landscape strategy for LCA 19 Bayhall Open Farmland.

**4.89** These measures would increase public access to remaining Green Belt land and would help deliver improved Green Infrastructure and biodiversity net gains, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019); and would help promote local recreational routes, in accordance with the landscape strategy for LCA 19 Bayhall Open Farmland (TWB LCA, 2017).



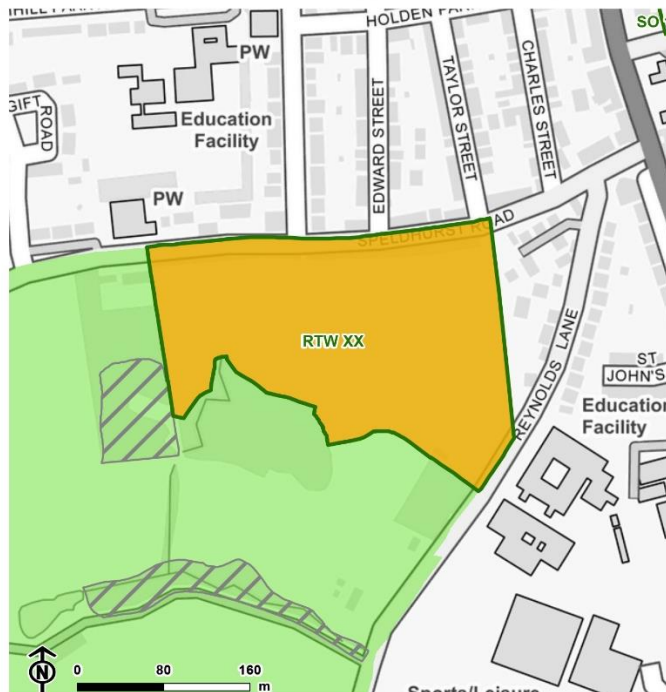
## AL/RTWXX: Land to the north of Caenwood Farm, Speldhurst Road

- Green Belt
  - Land released from Green Belt
  - Draft Local Plan allocation
  - Scheduled monument
  - National Nature Reserve
  - Local Nature Reserve
  - Local Wildlife Site
  - SAC
  - SSSI
  - SPA
  - Ancient woodland
  - Registered parks and gardens
  - Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
  - Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
  - High
  - Moderate-high
  - Moderate
  - Low-moderate
  - Low
  - Very low



Map 2: Harm ratings

## Allocation Summary

**4.90** AL/RTWXX is located to the south of Speldhurst Road and to the north-west of Reynolds Lane, adjoining the existing LBD for both Royal Tunbridge Wells and Southborough. It comprises three small pasture fields defined by gappy hedgerows on land sloping from approximately 115m AOD to the north-east to approximately 95m AOD to the south-west. The allocation site is defined by a mature hedgerow (covered by Tree Preservation Order) lining Speldhurst Road to the north; rear gardens of properties on Reynolds Lane to the east; by woodland blocks and hedgerows to the south; and by woodland blocks (including Ancient Woodland) to the west. A PRoW runs along the western boundary of the allocation site, connecting Speldhurst Road in the north with Reynolds Lane to the south-east. The site is contained by the built-up areas of Southborough to the north and by Tunbridge Wells to the east and south-east. The surrounding landscape to the west and south-west comprises a series of open agricultural fields interspersed by woodlands occupying a valley associated with a small stream.

**4.91** Only the northern two thirds of the allocation site are to be removed from the Green Belt under Policy AL/RTWXX; the southern third will be retained in the Green Belt for use as an open space and landscape buffer.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.92** The site does not extend far from the inset edge and is contained by existing urban development to the north, east and south-east. Whilst the mature hedgerow along Speldhurst Road creates a moderate boundary feature, garden boundaries on Reynolds Lane create a weak boundary feature. The terrain slopes away from the inset edge to the north and east and provides some distinction from the urban area. Neither the countryside nor urbanising development dominates views. Overall, the allocation site has a moderate distinction from the inset edge of Southborough/Tunbridge Wells.

### **Purpose 1: checking the sprawl of the large built up area**

**4.93** The land is open and is adjacent to the large built up area. It has a moderate degree of distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Moderate contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.94** The land is open and lies in a narrow gap between Tunbridge Wells and Southborough and has a moderate distinction from the inset settlement. It therefore makes a Relatively Strong contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.95** The land is countryside, is also open and has a moderate distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Moderate contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.96** The land forms part of the wider setting of Tunbridge Wells, but the site itself only forms a minor element in the setting of the historic town. It therefore makes a Relatively Weak contribution to preserving the setting and special character of Tunbridge Wells.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.97** All Green Belt land is considered to contribute equally to this purpose.

## Impact on adjacent Green Belt land

**4.98** Whilst the release of AL/RTWXX will breach the moderate and consistent Green Belt boundary formed by Speldhurst Road to the north, it will be replaced by an equally strong boundary formed by woodland blocks to the south. To the east only weak and inconsistent garden boundaries will be breached and this will also be replaced by the stronger woodland blocks (including Ancient Woodland) to the west. The presence of these mature woodland blocks will limit impact on adjacent Green Belt land to the south-west and west.

**4.99** The overall level of impact on adjacent Green Belt resulting from the release of AL/RTWXX will be Negligible.

## Harm summary

**4.100** AL/RTWXX makes a Relatively Strong contribution to preventing neighbouring towns merging, and a Moderate contribution to checking the sprawl of the large built up area and the prevention of encroachment on the countryside. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/RTWXX will be Low-Moderate.

**Low-Moderate**

## Variations in harm

**4.101** No variations in harm are identified within AL/RTWXX.

## Potential mitigation measures

**4.102** The wording for Draft Policy AL/RTWXX includes for the proposals to be informed by a detailed landscape and visual impact assessment and an arboricultural survey, taking into consideration existing hedgerows and mature trees on site and on the boundary of the site, with the layout and design of the development protecting those of most amenity value. Further enhancement of the hedgerows and woodlands defining AL/RTWXX with locally characteristic species would help further reduce any potential visual influence of development on adjacent Green Belt land.

**4.103** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 5: Speldhurst (Wooded Farmland) of the TWB LCA (2017).

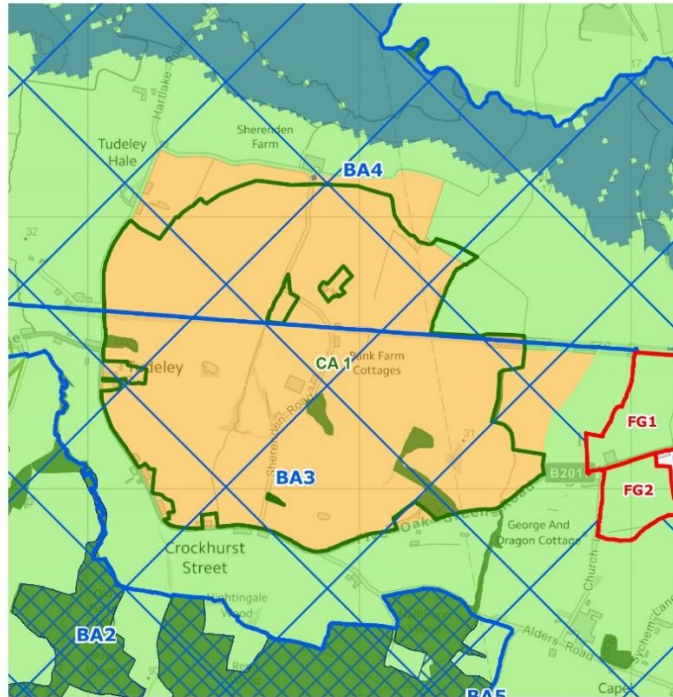
### **Potential to enhance beneficial use**

**4.104** The wording for Draft Policy AL/RTWXX includes for enhanced footpath links to be provided from the existing route to the west of the site to connect to other footpaths and the surrounding area; and improved access to the wider area which should be secured as public open space. This would increase public access and, with appropriate management, would help deliver improved GI. This would be in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).



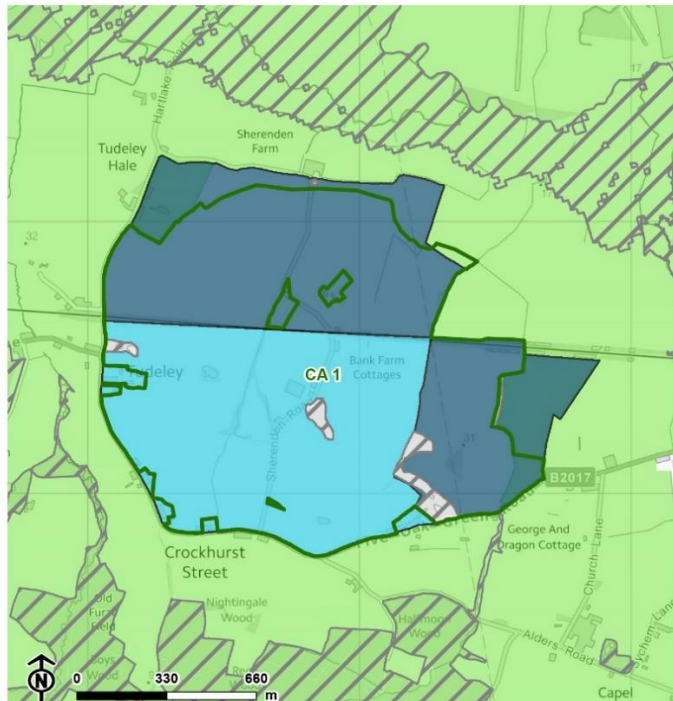
## AL/CA1: Tudeley Village

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings

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## Allocation Summary

**4.105** AL/CA1 is a large area of land approximately 183ha that will be released from the Green Belt to facilitate the delivery of a new stand-alone settlement. It lies roughly equidistant between the towns of Tonbridge to the west and Paddock Wood to the east, with the village of Five Oak Green located approximately 400m to the west. The draft allocation is generally consistent with the land to be released from the Green Belt, being defined to the south, south-east and south-west by Five Oak Green Road (B2017); to the north-west by Hartlake Road; and to the east by a series of hedgerows and ditches dividing arable fields. The northern boundary of the allocation is based on the extent of flood zone and as a result is less distinct, crossing unmarked through several open arable fields. However, the boundary for Green Belt release is more clearly defined further to the north by Sherenden Road and access track.

**4.106** The allocation site occupies low lying land to the south of the River Medway, with the gently rising lower slopes of the High Weald forming areas to the south. The landform is predominantly flat to gently undulating and features a mix of land uses, including arable, horticulture, orchards and pasture. Bank Farm and Lilley Farm are located centrally within AL/CA1 and there are also several small hamlets located on its periphery (all excluded from the allocation but within the area to be released from the Green Belt), including Brampton Bank to the south-east, Crockhurst Street to the south-west, Tudeley to the west and Tudeley Hale to the north-west. The Tonbridge to Paddock Wood railway passes east-west through the centre of the allocation, dissecting it into northern and southern halves; and the B2017, which defines the southern boundary of the allocation, connects Tonbridge with Paddock Wood via Five Oak Green. The allocation includes several small areas of Ancient Woodland and lies outside of, although immediately adjacent to, the High Weald AONB.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.107** The allocated area has a strong distinction from existing inset areas. It lies a significant distance from the inset edges of Tonbridge to the west and Paddock Wood to the east, and a reasonable distance from the inset edge of Five Oak Green to the south-east. In addition, land



is not contained by urban development and numerous intervening woodlands and hedgerows cumulatively create strong boundary features, meaning that views are dominated by open countryside.

### **Purpose 1: checking the sprawl of the large built up area**

**4.108** The land is not close enough to the large built-up area to be associated with it. It therefore makes No contribution to checking the sprawl of the large built up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.109** The land is open and lies in a wide gap between Paddock Wood and Tonbridge, but urbanising development at Five Oak Green and connecting features, including the railway and the B2017, reduce the perceived separation. It has a strong distinction from existing inset settlements, meaning that development will be more intrusive on the settlement gap than would be the case if the allocation area related more strongly to an existing inset settlement, but the size of the gap means that it makes a Relatively Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.110** The land comprises countryside, is open and has a strong distinction from existing inset settlements, with no characteristics to relate it to any urban areas. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Strong contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.111** Land does not form part of the setting of an historic town and therefore makes No contribution to preserving the setting and special character of historic towns.

## **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.112** All Green Belt land is considered to contribute equally to this purpose.

### **Impact on adjacent Green Belt land**

**4.113** When considering the role of Green Belt in preserving settlement separation, all sizeable inset settlements (including, for example, Pembury) have been treated as ‘towns’ in relation to Green Belt Purpose 2. Although it will be a garden village rather than a town, Tudeley falls into this category. Release of AL/CA1 will introduce a settlement with approximately 1.75 km separation from Tonbridge. Rail and road connections will reduce the perceived gap, but most of the Green Belt land in between will retain strong distinction from both settlements.

**4.114** To the east, the release of AL/CA1 along with the expanded Paddock Wood (AL/PW1) will create a gap of approximately 1.8km between Tudeley Village and Paddock Wood. However, existing intervening urban development at Five Oak Green, washed over development on Badsell Road, rail and road connections, and a lack of significant separating features will reduce the perceived gap. This will, without mitigation, weaken the strength of separation between the inset edge of Tudeley Village and existing inset development at Five Oak Green, although will still provide a level of distinction between the two settlements. The presence of a stronger gap between Five Oak Green and Paddock Wood means that there will still be strong Green Belt separation between Tudeley Village and Paddock Wood.

**4.115** Release of AL/CA1 will inevitably have some impact on the extent to which adjacent Green Belt land is perceived as being distinct from urban areas. To the south and south-west this impact will be limited: there will be increased proximity to the urban area and some urbanising visual impact from development, but Five Oak Green Road will form a clear Green Belt boundary, and changes in landform (rising topography to the south, and falling topography to the west between Tudeley and Crockhurst Street) will help to maintain an overall strong distinction from the inset area.

**4.116** Land to the north of the railway line will have weak landform distinction from the inset area and, other than along Hartlake Road, weak boundary distinction as well. Although there will

be no urbanising containment its proximity to, and the visual impact of, the urban edge will mean that there will be a moderate rather than strong distinction from the inset settlement.

**4.117** To the east, south of the railway line, existing hedgerows on the edge of the allocation site will form a weak Green Belt boundary and will increase the urbanising visual influence of development. This will result in a moderate distinction from the inset edge overall.

**4.118** The release of AL/CA1 will have a Moderate overall impact on adjacent Green Belt land.

## Harm summary

**4.119** AL/CA1 makes a Strong contribution to the prevention of encroachment on the countryside and a relatively weak contribution to preventing neighbouring towns merging into one another; and the impact of its release on the adjacent Green Belt will be Moderate. Harm resulting from the release of AL/CA1 will be High.

High

## Variations in harm

**4.120** Land south of the railway and west of Ancient Woodland and adjacent hedgerow to the north of Brampton Bank will contribute less to the impact on the perceived distance/separation between Tudeley Village and Paddock Wood when travelling along Five Oak Green Road and the railway. In addition, the existing railway and ancient woodland and robust hedgerow will form stronger Green Belt boundaries and will limit the urbanising visual impact of development on adjacent Green Belt land. The impact associated with the release of this area is minor-moderate and the harm rating is Moderate-High.

## Potential mitigation measures

**4.121** Draft Policy AL/CA1 includes for the provision of appropriate open space; consideration of the landscape characteristics, views and setting of the AONB; provision of higher density of development around the settlement centre and other key points within the development; structural landscaping and buffers around perimeters of the site; and the need to maintain a visual separation between Tudeley Village and Five Oak Green.

**4.122** Other potential mitigation measures could include the following:

- Open space and locally characteristic planting within the allocation site to the east to reduce impact on perceived separation between Tudeley Village and Five Oak Green.
- Open space and locally characteristic planting within the allocation site to the north to reduce the urbanising influence of development across the flat valley floor.
- Strengthen B2017 boundary by enhancing hedgerow planting and introduction of locally characteristic woodland copses and belts.
- Reduce the urbanising effect of development when travelling along the B2017 through use of set-back and appropriately designed road infrastructure to maintain the rural character of the road; and gradation in scale of built form, with lower density development to the periphery and in vicinity of railway and B2017.
- Introduce a village-like character to reduce the perception of being a 'town' in respect to Purpose 2, through the application of 'garden settlement' principles.
- Reduce urbanising influence on the surrounding landscape by avoiding high-density built development on rising ground to the south and south-west and ensuring new development is designed sensitively with views and local character considered.
- Use of sustainable drainage features to define/enhance separation between settlement and countryside, integrating with the existing pattern of dykes and streams.

**4.123** These measures would help to further reduce the potential visual influence of development on adjacent remaining Green Belt land and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 13 'Paddock Wood/Five Oak Green' (Low Weald Farmland) and LCA 17 'Medway valley' (River Valley) of the TWB LCA (2017).

## **Potential to enhance beneficial use**

**4.124** The wording for Draft Policy AL/CA1 includes for the provision of open space, leisure and recreational areas, including informal and formal space, children's and youth play space, sports pitches and allotments/food growing areas; generous, accessible, and good quality green and

blue infrastructure; and the provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality. It is also stated that attention will be given to opportunities to improve existing habitats and species and opportunities for landscape scale improvements to ensure a net gain for biodiversity. These measures would be in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

## Consideration of draft masterplan document

**4.125** The draft masterplan for Tudeley Village is included at Appendix A<sup>5</sup>. It includes a number of measures, which, if implemented in the way indicated, would help to minimise harm. These measures include:

- A secondary school and associated open playing fields, indicated to the east of the site. The latter will help reduce impact on perceived separation between Tudeley Village and Five Oak Green.
- Open recreational space and sports fields indicated to the north of the site on the floodplain. These will help to reduce the urbanising influence of development across the flat valley floor.
- The retention of vegetation (hedgerows and woodlands) within the allocation site, which will help to further reduce the potential visual influence of development on adjacent Green Belt land.
- Proposals to be in keeping with the local area in terms of building types, scales and materials. Building scale will help to reduce the urbanising effect of development, and building form and materials could also help in this respect, if it is able to convey rural character.

**4.126** However, the masterplan indicates that built development would front directly onto Five Oak Green Road (B2017), occupying the open frontages that currently lie between the scattered hamlets. This could have an urbanising effect when travelling along the B2017 and would

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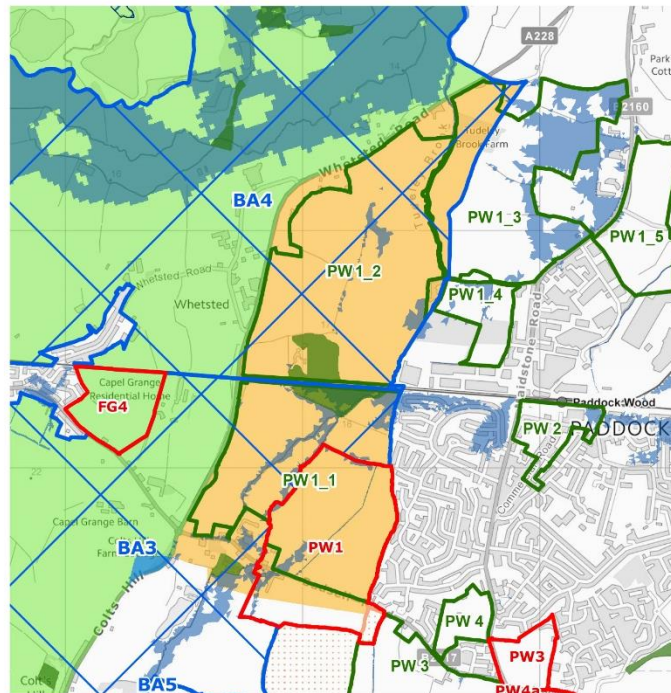
<sup>5</sup> Available at: [https://www.tudeleyvillage.co.uk/wp-content/uploads/2020/10/Tudeley-Village\\_Masterplan.jpg](https://www.tudeleyvillage.co.uk/wp-content/uploads/2020/10/Tudeley-Village_Masterplan.jpg)

impact on the perceived distance/separation between Tudeley Village and Paddock Wood. As set out in the potential mitigation measures section of the Stage Three Green Belt Study, this impact could be reduced through a number of measures, including: the use of set-back and appropriately designed road infrastructure to maintain the rural character of the road; a gradation in scale of built development from lower density development to the periphery to higher density around the settlement centre and other key points; and the strengthening of the B2017 boundary by enhancing hedgerow planting and introduction of locally characteristic woodland copses and belts.



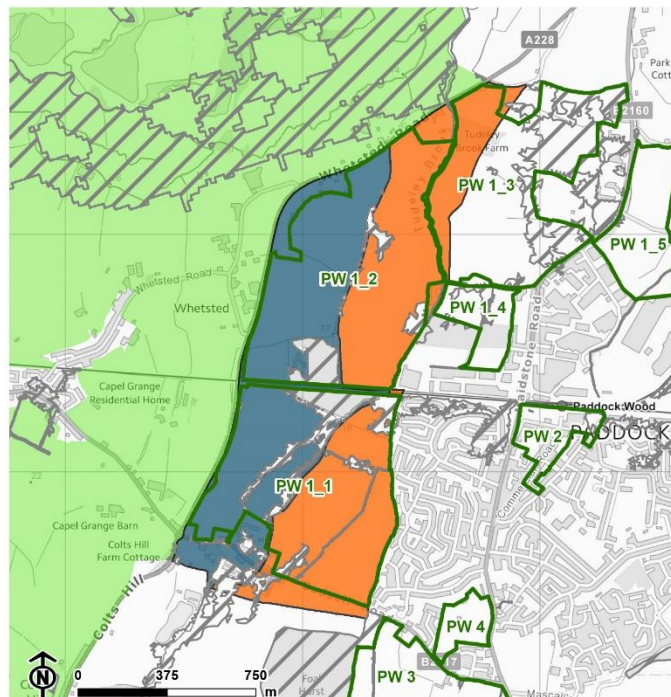
## AL/CA3 and AL/PW1: Land at Capel and Paddock Wood

- Green Belt
- Land released from Green Belt
- Land added to Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings



## Allocation Summary

**4.127** AL/CA3 and AL/PW1 (herein referred to as AL/PW1) includes a large area of land of approximately 148ha to the west and north-west and north of Paddock Wood that will be released from the Green Belt to facilitate the expansion of the town. This is part of a larger allocation that also includes extensive areas of non-Green Belt land to the north and east of Paddock Wood.

**4.128** The land to be released from the Green Belt includes two whole parcels - PW1\_1 (south-west parcel) and PW\_1\_2 (north-west parcel) - and small parts of PW1\_3 (north central parcel) and PW1\_4 (north-west central parcel). The area to be released from the Green Belt follows the western extent of the existing Paddock Wood LBD and is defined to north and north-west by Whetstone Road (the A228); to the west by Maidstone Road (the A228); and to the south it extends beyond Badsell Road (the B2017) to the edge of the existing Green Belt boundary (which currently follows the Paddock Wood/Capel parish boundary). The reason for releasing the land beyond Badsell Road (which defines the southern edge of AL/PW1) to the south is to prevent what would otherwise be an anomalous thin sliver of land remaining in the Green Belt.

**4.129** The relevant part of the allocation (that is, parcels PW1\_1, PW1\_2 and western parts of parcels PW1\_3 and PW1\_4) occupies low lying, relatively flat land to the south of the River Medway and predominantly comprises arable farmland divided by hedgerows. It features one notable area of woodland – Whetsted Wood (Ancient Woodland) – and Tudeley Brook, along with the associated Flood zone 3b, extends through the area from north to south. The Tonbridge to Paddock Wood railway passes east-west through the centre of the allocation, separating parcels PW1\_1 and PW1\_2; and the B2017, which passes through the south of the allocation, connects Paddock Wood with Tonbridge to the west, via Five Oak Green.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.130** The low-lying terrain across the area as a whole is similar to that of the inset area, and land cover does not add any additional distinction, but there is no urbanising containment from other inset or washed-over development. With regard to boundary strength, visual urbanising

influence and the effects of distance from the inset settlement, there are variations within this sizeable allocation:

- In the eastern half of PW1\_1 (the two fields immediately adjacent to the inset edge defined on its outer western edge by the hedgerow between the inset edge and Tudeley Brook and Whetsted Wood), trees along the inset settlement edge add some strength to back garden boundaries, and prevent the urban area from dominating views, but proximity to the inset settlement limits distinction.
- The well-treed boundary hedgerow of the remaining field to the west of Tudeley Brook adds some additional separation for this area, and the land within PW1\_1 to the west of Tudeley Brook has stronger distinction again, in terms of the combined role of boundary hedgerows and the brook in creating physical and visual separation from the town.
- For the eastern part of PW1\_2 (land defined on its outer western edge by Whetsted Wood and field boundary extending north to the A228), Tudeley Brook constitutes a moderate boundary feature, but to the south of the east-west farm track views are dominated by larger scale urban development on Eldon Way . North of the farm track there is no boundary feature to define the as yet undeveloped inset settlement edge, but Tudeley Brook creates some separation within the open agricultural landscape, and urbanising visual influence diminishes with distance.
- To the west of the hedgerow that runs north from Whetsted Wood there is greater physical and visual separation from the town, and although there is no hedgerow to the north of the farm track, there is increased distance from the urbanising influences of current development.
- A small area of PW1\_3 is also Green Belt. The absence of any inset edge boundary feature weakens distinction here, but current built development is too far from it to have a significant urbanising influence.

### **Purpose 1: checking the sprawl of the large built up area**

**4.131** The land is not close enough to the large built-up area of Tunbridge Wells to be associated with it. The land therefore makes No contribution to checking the sprawl of the large built up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.132** The land is open and lies in a wide gap between Paddock Wood and Tonbridge, but urbanising development at Five Oak Green and connecting features, including a railway and the B2017, reduce the perceived separation. The western parts of the allocation area are considered to have strong distinction from existing inset settlements, meaning that development will be more intrusive on the settlement gap than would be the case if the allocation area related more strongly to an existing inset settlement, but the size of the gap means that it makes a Relatively Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.133** The allocation is open countryside, and its western half has strong distinction from the inset settlement. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Strong contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.134** The land does not form part of the setting of an historic town, and therefore makes No contribution to safeguarding the countryside from encroachment.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.135** All Green Belt land is considered to contribute equally to this purpose.

## Impact on adjacent Green Belt land

**4.136** The introduction of Tudeley Village (AL/CA1), which is of a size that would constitute a Purpose 2 'town', and the release of AL/PW1 will create a gap of approximately 1.8km between Paddock Wood and Tudeley Village. However, intervening urban development at Five Oak Green, washed-over development on Badsell Road, rail and road connections, and a lack of significant separating features, will reduce the perceived gap. The perceived reduction in separation will be particularly apparent when travelling along Badsell Road and Five Oak Green Road, which will become more urbanised. This will significantly diminish the existing wide gap of approximately 5km between Tonbridge and Paddock Wood.

**4.137** Release of AL/PW1 will have less impact in terms of the distinction between settlement and countryside. Remaining open land between Paddock Wood and Five Oak Green will be more contained, but Maidstone Road (the A228) and its associated mature tree lines will form a strong Green Belt boundary, meaning that some strong Green Belt between the two settlements will still remain.

**4.138** To the north-west, the washed-over settlement of Whetsted will be left very close to the inset edge of Paddock Wood, but Whetsted Road (the A228) and adjacent mature hedgerows will form a strong Green Belt boundary feature which will limit the urbanising visual impact of development. Development in Whetsted is not considered to be urban in character, and therefore does not weaken Green Belt openness, so land to the west of the A228 would still be considered uncontained.

**4.139** To the north, only a narrow belt of land, largely wooded, will remain between Whetsted Road and the constrained flood zone around tributaries of the River Medway, so there is limited potential for further weakening of the Green Belt.

**4.140** The release of AL/PW1 will have a Moderate overall impact on adjacent Green Belt land, due principally to the significant loss of separation between towns that is associated with the creation of Tudeley Village.

## Harm summary

**4.141** AL/PW1 makes a Strong contribution to the prevention of encroachment on the countryside and a Relatively Weak contribution to preventing neighbouring towns merging into one another; and the impact of its release on the adjacent Green Belt will be Moderate. Harm resulting from the release of AL/PW1 will be High.

High

## Variations in harm

**4.142** The field to the north of Badsell Manor Farm (defined on its western edge by Tudeley Brook and on its eastern edge by the hedgerow lying between the inset edge and Tudeley Brook) makes a Relatively Strong contribution to Purpose 3, but it will contribute less to the impact on the perceived separation between Tudeley Village and Paddock Wood and will cause less impact on the distinction of adjacent Green Belt land to the south-west, west, north-west and north. The impact associated with the release of this area is Minor-Moderate and the harm rating is Moderate.

**4.143** Parts of PW1\_3 and PW1\_4 and the eastern half of PW1\_1 and PW 1\_2 (defined on its outer edge by the hedgerow between the inset edge and Tudeley Brook to the south and by Whetsted Wood and adjacent hedgerow extending north to the A228) lie immediately adjacent to the existing inset edge of Paddock Wood and therefore have a weaker distinction from the inset edge and make only a Moderate contribution to Purpose 3. Furthermore, this land will contribute less to the impact on the perceived separation between Tudeley Village and Paddock Wood, although its release will still weaken remaining stronger Green Belt within the allocation area. The impact associated with the release of this area is Minor-Moderate and the harm rating is Moderate.

**4.144** In the northern part of PW1\_2, where there is a very weak field boundary running north-south through the allocation, the transition from Moderate to High harm can be considered gradual rather than precise, with an intermediate area of Moderate-High harm.

## Potential mitigation measures

**4.145** Draft Policy AL/PW1 includes for the retention and enhancement of hedging and trees along the A228; the need for development to be set back from A228 to reduce visual impact of development on countryside; and use of internal hedging and tree belts along field boundaries to influence development layout.

**4.146** Other potential mitigation measures could include the following:

- Reduce the urbanising effect of development when travelling along Badsell Road through use of set-back and appropriately designed road infrastructure to maintain the rural character of the road; and gradation in scale of built form, with lower density development to the periphery and in vicinity of railway and Badsell Road.
- Open space and planting to the west and south of the allocation to reduce impact on perceived separation between Paddock Wood and Five Oak Green/Tudeley Village.
- Reduce the potential impact on the sense of separation from the washed-over settlement of Whetsted through use of set-back from the A228 and by enhancing hedgerow planting and introduction of characteristic small woodland copses and tree belts along the A228.
- Use of sustainable drainage features to define/enhance separation between settlement and countryside, integrating with existing pattern of dykes and streams.

**4.147** These measures would help to further reduce the potential visual influence of development on adjacent Green Belt land and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 13 'Paddock Wood/Five Oak Green Low Weald Farmland' of the TWB LCA (2017).

## Potential to enhance beneficial use

**4.148** The wording for Draft Policy AL/PW1 includes for the provision of open space, youth and children's play and sports facilities; and generous, accessible, and good quality green and blue infrastructure. It also states that development will follow garden village principles, including 'green wedges' between areas of development; and that opportunities to deliver environmental gains such as biodiversity net gain and enhancements to natural capital should be



demonstrated. These measures would be introduced to land removed from the Green Belt, and would therefore not technically constitute beneficial use of remaining Green Belt land, although the 'green wedges' would link with remaining Green Belt land surrounding the allocation site.

**4.149** Other potential enhancement measures could include the provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality. These measures would be in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

## Consideration of draft masterplan document

**4.150** The draft masterplan for Paddock Wood is included at Appendix A<sup>6</sup>. It includes a number of measures, which, if implemented in the way indicated, would help to minimise harm. These measures include:

- A proposed 'Sports Hub Area' and adjacent Green Strategic Landscape Corridor to the south-west of the allocation site, which would help reduce impact on perceived separation between Paddock Wood and Five Oak Green/Tudeley Village.
- The retention and mature vegetation surrounding Badsell Manor to the south-west of the allocation site, which would help to reduce the urbanising effect of development and the impact on the perceived gap between Paddock Wood and Tudeley Village.
- The strengthening of hedgerows and vegetation along the A228, which will strengthen its role as a Green Belt boundary and help reduce impact on adjacent Green Belt land to the west and north-west.
- The retention of vegetation (hedgerows and woodlands) within the allocation site, which would help to further reduce the potential visual influence of development on adjacent Green Belt land.
- The set back of development and strengthening of vegetation along Badsell Road, which would help to reduce the urbanising effect of development when travelling between Paddock Wood and Tudeley Village.

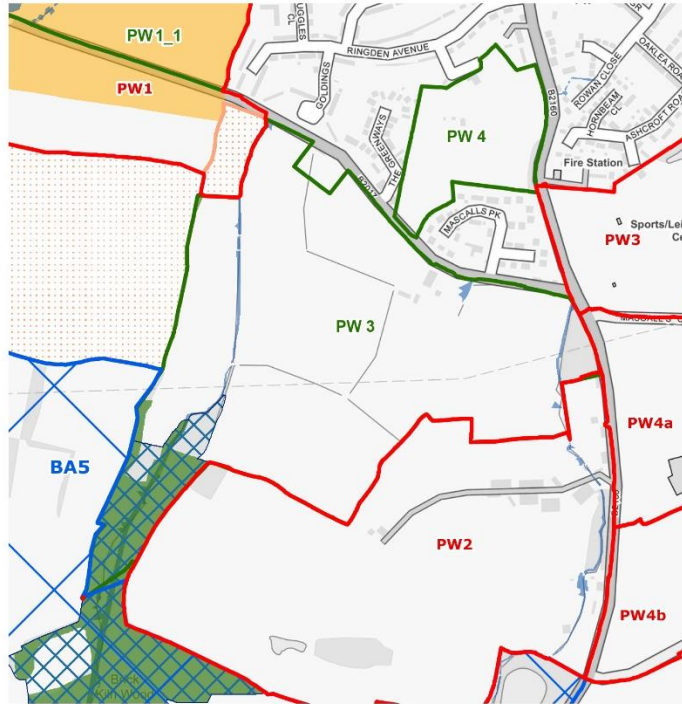
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<sup>6</sup> David Lock Associates, drawing number TWBC02-027-2b Revision B, 24 September 2020.

**4.151** However, the masterplan indicates that built development would be located to the north-west of the allocation site in close proximity to Whetsted Road (A228) which would bring the new inset edge close to washed over development in Whetsted. As set out in the potential mitigation measures section of the Stage Three Green Belt Study, this impact could be reduced through the use of set-back from the A228 boundary and by enhancing hedgerow planting and introduction of characteristic small woodland copses and tree belts along the A228.

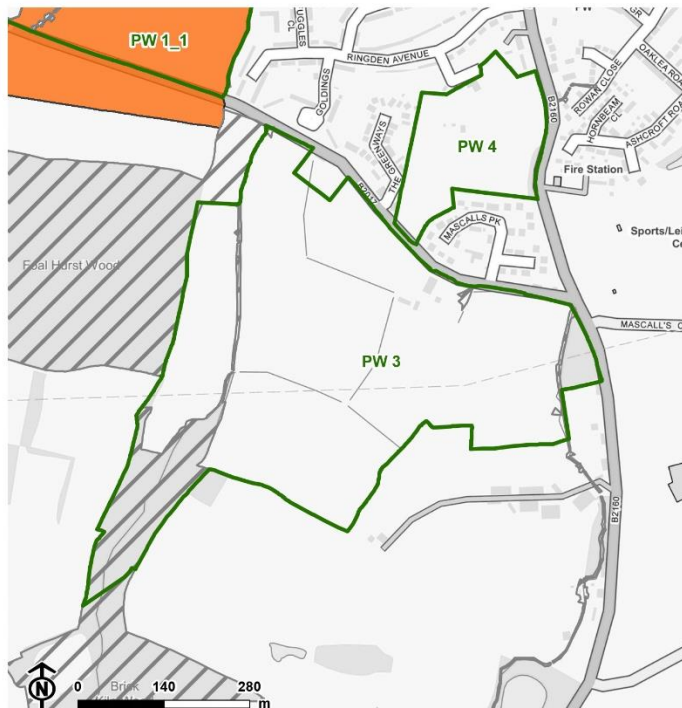
## AL/PW3: Land at Mascalls Farm

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings

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## Allocation Summary

**4.152** AL/PW3 is located to the south of the built-up edge of Paddock Wood, within the existing LBD. It is defined by Badsell Road (the B2017) to the north; by Maidstone Road (the B2160) to the east; by a series of gappy field hedgerows to the south; by Brick Kiln Wood (Ancient Woodland) to the south-west; and by Foal Hurst Wood (Ancient Woodland and SSSI) to the west. The land predominantly comprises arable fields and orchards defined by hedgerows and/or agricultural fencing.

## Contribution to the Green Belt Purposes

**4.153** AL/PW3 does not fall within the Green Belt; the nearest existing Green Belt land is currently located to the south of Badsell Road approximately 65m to the north-west. However, the Green Belt land in this location will be removed as part of AL/PW1, and the new Green Belt boundary pulled back further west to Maidstone Road (the A228). This will mean that the nearest Green Belt land to AL/PW3 will be approximately 900m away to the west.

**4.154** As the allocated land is not located within the Green Belt, it makes no contribution towards the purposes of the Green Belt.

## Impact on adjacent Green Belt land

**4.155** Considering the presence of Ancient Woodland along the allocation's western boundary (to be retained under Policy AL/PW3), development of the land will have minimal/no impact on the nearest Green Belt land to the west.

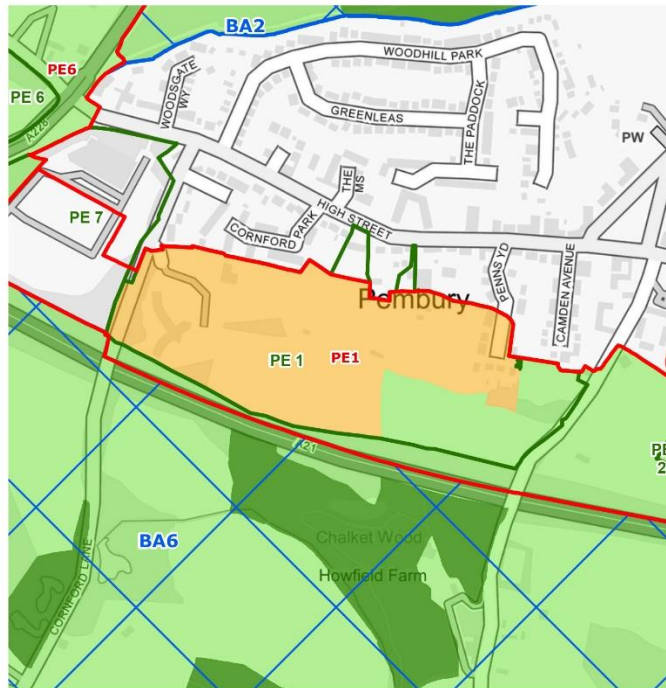
## Harm summary

**4.156** AL/PW3 makes no contribution to the Green Belt purposes, and the impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/PW1 will be Very Low.

**Very Low**

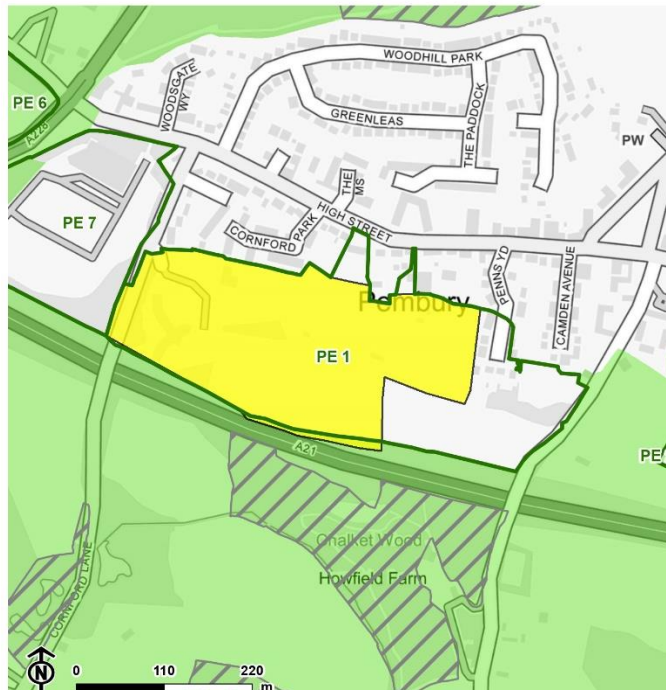
## AL/PE1: Land rear of High Street and west of Chalket Lane

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings



## Allocation Summary

**4.157** This allocation is located between the southern edge of Pembury and the A21, adjoining and partly within the existing Pembury LBD to the north. The northern boundary is irregular, partly defined by the rear gardens of existing properties on Pembury High Street, Camden Avenue and Penns Yard/Chestnut Walk; and partly by small areas of land that front directly onto Pembury High Street (the latter being outside the Green Belt). The eastern boundary is defined by Chalket Lane, the southern boundary by densely vegetated cutting of the A21, and the western boundary by woodland belts and copses separating the allocated land from the adjacent Cornford House Nursing Home development (currently washed over by the Green Belt).

**4.158** The allocated land predominantly comprises a series of pastoral fields defined by hedgerows, with the area to the south-east comprising grassland with numerous scattered mature trees. The allocation lies within the High Weald AONB and adjoins the Pembury Conservation Area, with a small area (that is, land fronting onto Pembury High Street) falling partly within this.

**4.159** The area to be removed from the Green Belt excludes the south-eastern part of the allocation, but includes additional land outside the allocation to the west (i.e. washed over development at Cornford House) and north-east (i.e. washed over development on Penns Yard).

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.160** Rear gardens to the north form a weak boundary to the inset edge, and with most of the allocation lying in close proximity to the inset edge views are dominated by the urban area. Terrain and land are not distinctive. The allocation also has some degree of containment by urban development - the inset development in Pembury to the north, washed over low-density development at Cornford House to the west and houses on Penns Yard. However, the south-east area of the allocation site has some distinction in terms of land cover owing to the tree cover.



### **Purpose 1: checking the sprawl of the large built up area**

**4.161** The land is adjacent to the Tunbridge Wells large built-up area, of which Pembury is part, but whilst it is open it has a weak distinction from the inset settlement with characteristics that relate it more to the urban area than to countryside. The weaker the distinction from the urban area, the lesser the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Relatively Weak contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.162** The land is open but is peripheral to a narrow gap between Pembury and Tunbridge Wells and has a weak distinction from the inset settlement. It therefore makes a Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.163** Although the land is predominantly countryside, comprising fields in agricultural use interspersed with woodland, and is open, it has a relatively strong relationship with the inset settlement. It therefore makes a Relatively Weak contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.164** The land forms a largely undeveloped skyline that contributes to the wider rural setting of Tunbridge Wells, and therefore makes a Relatively Weak contribution to preserving the setting and special character of historic towns.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.165** All Green Belt land is considered to contribute equally to this purpose.

## Impact on adjacent Green Belt land

**4.166** Under Policy AL/PE1 the land containing existing washed over development to the west and east of the allocation would be released from the Green Belt. Therefore, only land adjacent to the allocation to the south and south-east will remain as Green Belt land.

**4.167** The release of AL/PE1 will replace an existing weak Green Belt boundary (rear gardens of residential properties) with a strong boundary (the wooded cutting of the A21). In addition, AL/PE1 includes for a landscape buffer to the south which would further strengthen this boundary feature. The presence of this strong boundary will limit the impact of release on adjacent land to the south.

**4.168** The overall level of impact on adjacent Green Belt resulting from the release of AL/PE1 will be Negligible.

**4.169** Land to the south-east of AL/PE1 does not make a stronger contribution to any of the Green Belt purposes. Any impact on this land would not therefore increase overall harm.

**4.170** The retention of the land to the south-east of AL/PE1 within the Green Belt, including the area with tree cover, and the presence of Chalket Lane will limit the impact on adjacent Green Belt land to the east.

## Harm summary

**4.171** AL/PE1 makes a Relatively Weak contribution to checking the unrestricted sprawl of the large built up area, to the prevention of encroachment on the countryside and to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/PE1 will be Low.

**Low**

## Variations in harm

**4.172** No variations in harm are identified within AL/PE1.

## Potential mitigation measures

**4.173** Draft Policy AL/PE1 includes for the need for a landscape and visual impact assessment to inform building heights; consideration of the setting of Pembury Conservation Area; a landscape buffer of approximately 40m depth in addition to the existing vegetation along the southern edge of the site adjacent to the A21; and the retention/improvement of existing hedges within the site. No measures over and above those included within the Regulation 18 draft policy wording for Policy AL/PE1 are considered necessary.

**4.174** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into its surrounding context, in accordance with the landscape strategy for LCA 14 Pembury/Capel (Forested Plateau) of the TWB LCA (2017).

## Potential to enhance beneficial use

**4.175** Draft Policy AL/PE1 includes for the provision of links to the wider PRow network; opportunities for the provision of a cycle link to Royal Tunbridge Wells to be explored; and provision of improvements to existing allotments, parks and recreation grounds. These measures would increase public access to remaining Green Belt land and would help deliver improved Green Infrastructure, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

**4.176** Other potential measures to enhance beneficial use could include the provision of improvements to the environmental quality of adjacent land remaining within the Green Belt, including net gains to biodiversity, in line with the Green Infrastructure Framework.

## AL/PE2: Land at Hubbles Farm and south of Hastings Road

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings

## Allocation Summary

**4.177** This allocation is located between the A21 and the southern edge of Pembury, adjoining and partly within the existing Pembury LBD to the north. It comprises Hubble's Farm and associated access track and a number of surrounding pasture fields defined by hedgerows and/or agricultural fencing. The northern boundary of the allocation is largely defined by the rear gardens of existing properties on Hastings Road, although includes a small area of land that fronts directly onto Hastings Road (this is outside the Green Belt) containing three residential properties and the access entrance to Hubble's Farm. The eastern boundary is defined by a hedgerow separating the parcel from further agricultural fields (AL/PE3); the southern boundary by densely vegetated cutting of the A21; and the western boundary largely by a hedgerow that separates the parcel from agricultural fields and the churchyard of Upper Church of St Peter (Grade II\* listed), although includes an area of land extending beyond the hedgerow adjacent to the cemetery. The allocation lies within the AONB and adjoins the Pembury Conservation Area to the north-west.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.178** Although the land is not contained by urban development it lies in close proximity to the urban area, rear gardens to the north create a weak boundary feature, views are dominated by the urban area and the terrain and land cover do not add any distinction.

### Purpose 1: checking the sprawl of the large built up area

**4.179** The land is adjacent to the Tunbridge Wells large built-up area, of which Pembury is part, but whilst it is open it has a weak distinction from the inset settlement with characteristics that relate it more to the urban area than to countryside. The weaker the distinction from the urban area, the lesser the extent to which development would be perceived as sprawl Overall the allocation area makes a Relatively Weak contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.180** The land is open but has a weak distinction from the inset settlement and lies in a wide gap (2.5-3km) between Pembury and Tunbridge Wells, with some significant separating features (including the A21). It therefore makes a Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.181** Although the land is predominantly countryside, comprising fields and hedgerows, and is open, it has a relatively strong relationship with the inset settlement. It therefore makes a Relatively Weak contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.182** The land forms a largely undeveloped skyline that contributes to the wider rural setting of Tunbridge Wells, and therefore makes a Relatively Weak contribution to preserving the setting and special character of historic towns.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.183** All Green Belt land is considered to contribute equally to this purpose.

## **Impact on adjacent Green Belt land**

**4.184** The release of AL/PE2 will replace an existing weak Green Belt boundary (rear gardens of residential properties) with a strong boundary (the wooded cutting of the A21). In addition, AL/PE2 includes for a landscape buffer to the south which would further strengthen this boundary feature. The presence of this strong boundary will limit the impact of release on adjacent Green Belt land to the south.

**4.185** The overall level of impact on adjacent Green Belt resulting from the release of AL/PE2 will be Negligible.



**4.186** Land to the west of AL/PE2 does not make a stronger contribution to any of the Green Belt purposes. Any impact on this land would not therefore increase overall harm.

## Harm summary

**4.187** AL/PE2 makes a Relatively Weak contribution to checking the unrestricted sprawl of the large built up area, to the prevention of encroachment on the countryside and to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/PE2 will be Low.

**Low**

## Variations in harm

**4.188** No variations in harm are identified within AL/PE2.

## Potential mitigation measures

**4.189** Draft Policy AL/PE2 includes for the need for a landscape and visual impact assessment; scope to enhance tree coverage along the southern edge of the site; consideration of the setting of Pembury Conservation Area; a landscape buffer of approximately 40m depth in addition to the existing vegetation along the southern edge of the site adjacent to the A21; the retention/improvement of existing hedges within the site; and no built development to be located south of the cemetery. No measures over and above those included within the Regulation 18 draft policy wording for Policy AL/PE2 are considered necessary.

**4.190** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into its surrounding context, in accordance with the landscape strategy for LCA 14 Pembury/Capel (Forested Plateau) of the TWB LCA (2017).

## Potential to enhance beneficial use

**4.191** Draft Policy AL/PE2 includes for the provision of pedestrian link/cycle to the west to join existing PRoW WT240; opportunities for the provision of a cycle link to Royal Tunbridge Wells

to be explored; and provision of improvements to existing allotments, parks and youth play space. These measures would increase public access to remaining Green Belt land and would help deliver improved Green Infrastructure, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

**4.192** Other potential measures that could enhance beneficial use could include the provision of improvements to the environmental quality of adjacent land remaining within the Green Belt adjacent to the site, including net gains to biodiversity, in line with the Green Infrastructure Framework.

## AL/PE3: Land north of the A21, south and west of Hastings Road



## Allocation Summary

**4.193** This allocation is located between the A21 to the south and the LBD of Pembury to the north and north-east (Henwood Green). It comprises two agricultural fields and is defined to the north by a hedgerow with a number of mature trees lining Hastings Road, by Henwood Green Road and intermittent hedgerow trees to the east, by a hedgerow separating the parcel from further agricultural fields associated with Hubble's Farm (AL/PE2) to the west, and by the densely vegetated edge of A21 to the south. The allocation lies within the AONB and is bordered a small block of Ancient Woodland to the south-west.

**4.194** Land to be released from the Green Belt is largely consistent with the allocation boundary, although includes additional land along Hastings Road to the north and along Henwood Green Road to the north-east, in order to link it to the adjacent inset settlement.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.195** The allocation is close to the inset area, with development in Pembury to the north and north-east (Henwood Green), Henwood Green Road to the east and the A21 to the south creating urban containment. Mature hedgerow lining Hastings Road to the north creates a moderate distinction from the inset area, and prevents the urban area from dominating views, but the terrain and land cover do not create additional distinction.

### Purpose 1: checking the sprawl of the large built up area

**4.196** The land is adjacent to the Tunbridge Wells large built-up area, of which Pembury is part, but whilst it is open it has a weak distinction from the inset settlement with characteristics that relate it more to the urban area than to countryside. The weaker the distinction from the urban area, the lesser the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Relatively Weak contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.197** The land is open but has a weak distinction from the inset settlement and lies in a wide gap (2.5-3km) between Pembury and Tunbridge Wells, with some significant separating features (including the A21). It therefore makes a Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.198** Although the land is predominantly countryside, comprising fields and hedgerows, and is open, it has a relatively strong relationship with the inset settlement. It therefore makes a Relatively Weak contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.199** The land forms a largely undeveloped skyline that contributes to the wider rural setting of Tunbridge Wells, and therefore makes a Relatively Weak contribution to preserving the setting and special character of historic towns.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.200** All Green Belt land is considered to contribute equally to this purpose.

## **Impact on adjacent Green Belt land**

**4.201** The release of AL/PE3 will replace an existing moderate Green Belt boundary (Hastings Road and Henwood Green Road) with a strong boundary (the wooded cutting of the A21). In addition, AL/PE3 includes for a landscape buffer to the south which would further strengthen this boundary feature. The presence of this strong boundary will limit the impact of release on adjacent land to the south, and the proposed landscape buffer to the south of the site will limit any potential impact on adjacent Green Belt land to the east, meaning there will be a negligible impact on distinction of adjacent Green Belt land.

**4.202** The overall level of impact on adjacent Green Belt resulting from the release of AL/PE3 will be Negligible.

## Harm summary

**4.203** AL/PE3 makes a Relatively Weak contribution to checking the unrestricted sprawl of the large built up area, to the prevention of encroachment on the countryside and to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/PE3 will be Low.

**Low**

## Variations in harm

**4.204** No variations in harm are identified within AL/PE3.

## Potential mitigation measures

**4.205** Draft Policy AL/PE3 includes for the need for a landscape and visual impact assessment; regard to be given to hedgerows on the site, with the layout and design of development to protect those of most amenity value; opportunities to be explored to increase tree coverage along the southern edge of the site; and a landscape buffer of approximately 40m depth in addition to the existing vegetation along the southern edge of the site adjacent to the A21. No measures over and above those included within the Regulation 18 draft policy wording for Policy AL/PE3 are considered necessary.

**4.206** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into its surrounding context, in accordance with the landscape strategy for LCA 14 Pembury/Capel (Forested Plateau) of the TWB LCA (2017).

## Potential to enhance beneficial use

**4.207** Draft Policy AL/PE3 includes for the provision of links to the wider PRow network; opportunities for the provision of a cycle link to Royal Tunbridge Wells to be explored; and provision of improvements to existing allotments, parks and recreational space and youth play space. These measures would increase public access to remaining Green Belt land and would

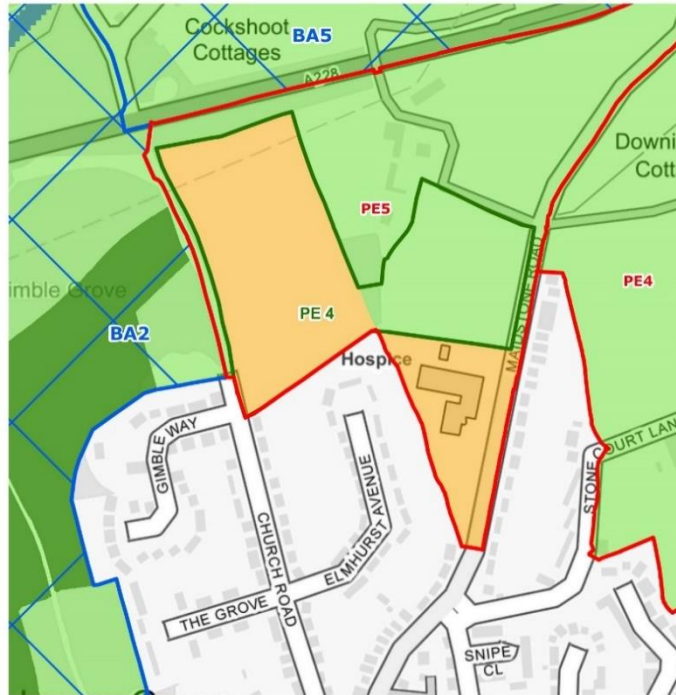


help deliver improved Green Infrastructure, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

**4.208** Other potential measures that could enhance beneficial use could include the provision of improvements to the environmental quality of land adjacent to the site remaining within the Green Belt, including net gains to biodiversity, in line with the Green Infrastructure Framework.

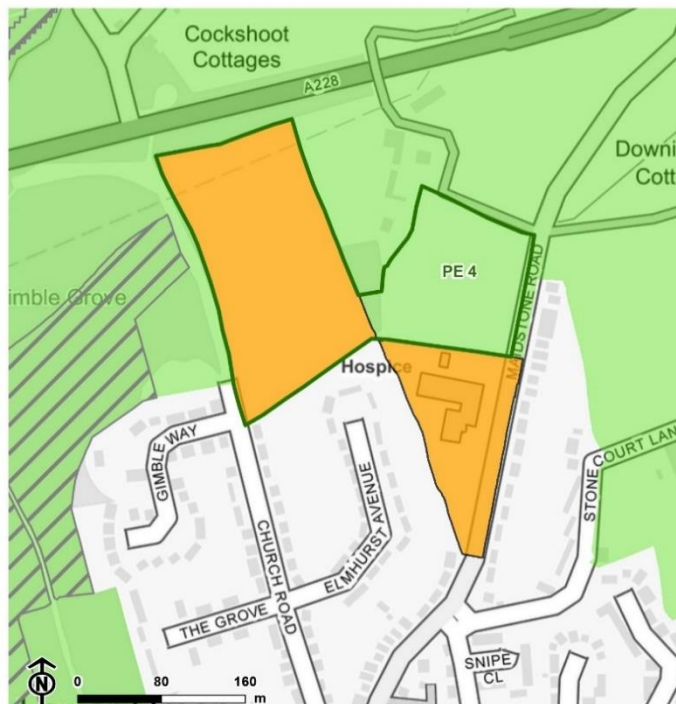
## AL/PE4: Land at Downingbury Farm, Maidstone Road

- Green Belt
  - Land released from Green Belt
  - Draft Local Plan allocation
  - Scheduled monument
  - National Nature Reserve
  - Local Nature Reserve
  - Local Wildlife Site
  - SAC
  - SSSI
  - SPA
  - Ancient woodland
  - Registered parks and gardens
  - Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
  - Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
  - High
  - Moderate-high
  - Moderate
  - Low-moderate
  - Low
  - Very low



Map 2: Harm ratings

## Allocation Summary

**4.209** AL/PE4 is located on the northern edge of Pembury (Lower Green) and extends as far north as a tree belt lining the Pembury Northern Bypass (A228). It is an irregular shaped parcel of land defined by the rear gardens of properties on Elmhurst Avenue and Church Road (lying within the Pembury LBD) to the south-west and the Hospice in the Weald (lying outside the LBD) to the south-east; by Rowley Hill (track) to the west, beyond which are extensive areas of woodland (including Ancient Woodland); by the vegetated embankment of the A228 and a hedgerow to the north-west; by the buildings, access track and small woodland copse associated with Downingbury Farm (located outside of the allocation) to the north-east; and by Maidstone Road to the east. The allocation comprises orchards surrounding Downingbury Farm. The allocation site lies almost entirely within the AONB.

**4.210** Land to be released from the Green Belt includes the allocated land to the west of Downingbury Farm, as well as the land associated with the Hospice in the Weald outside the allocation to the south-east. The land within the allocation immediately north of the hospice is to be retained within the Green Belt.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.211** The allocation extends a reasonable distance from the inset area and is not contained by urban development. However, the rear gardens of residential properties and hedgerow adjacent to the Hospice in the Weald form weak boundary features, and, the terrain is similar to the inset area. The inset area has some urbanising visual influence.

### Purpose 1: checking the sprawl of the large built up area

**4.212** The land is open and adjacent to the Tunbridge Wells large built-up area, of which Pembury is part. It has a moderate distinction from the inset settlement with characteristics that relate it to both the urban area and to countryside. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as sprawl. Overall, the allocation area makes a Moderate contribution to checking the sprawl of the large built-up area.

### **Purpose 2: preventing neighbouring towns merging**

**4.213** The land does not lie between neighbouring towns. It therefore makes a Weak contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.214** The land is countryside, is also open and has a moderate distinction from the inset area, with some characteristics that relate it to the urban area and some that separate it. The stronger the distinction from the urban area, the greater the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Moderate contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.215** The land does not form part of the setting of an historic town and therefore makes a Weak contribution to preserving the setting and special character of historic towns.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.216** All Green Belt land is considered to contribute equally to this purpose.

## **Impact on adjacent Green Belt land**

**4.217** The release of AL/PE4 will cause no weakening of the distinction between settlement and adjacent Green Belt land to the north and west. Containment provided by extensive mature woodland cover to the west of Rowley Hill, and by the A228 and its vegetated embankment, will limit any potential impact on adjacent Green Belt land to the west and to the north respectively. Whilst the new inset edge will extend further north than the existing LBD, this will replace an existing weak boundary (i.e. garden boundaries and hedgerow adjacent to the Hospice in the Weald) with a strong boundary (vegetated embankment of the A228).

**4.218** As the proposed area of release within the allocation will be restricted to the western half of the allocation, with the eastern half remaining in the Green Belt, the impact on Green Belt land beyond Maidstone Road to the east will be minimal. Any potential increase in the

urbanising visual impact of development will be limited by the intervening woodland copse and hedgerow adjacent to Downingbury Farm, and by the farm buildings.

**4.219** The overall level of impact on adjacent Green Belt resulting from the release of AL/PE4 will be Negligible.

**4.220** The land contained between the proposed release, Maidstone Road and the A228 does not make a stronger contribution to the Green Belt purposes than the area proposed for release, so there would be no additional harm to the Green Belt as a result of impact on this area.

## Harm summary

**4.221** AL/PE4 makes a Moderate contribution to checking the unrestricted sprawl of the large built up area and to safeguarding the countryside from encroachment. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/PE4 will be Low-Moderate.

**Low-Moderate**

## Variations in harm

**4.222** No variations in harm are identified within AL/PE4.

## Potential mitigation measures

**4.223** Draft Policy AL/PE4 includes for the need for design proposals to consider and minimise the impact on the listed farmhouses and buildings within the site (this would also help minimise impact on the Green Belt land to the west); and a landscape buffer to the north of the site. Other potential mitigation measures could include the retention and enhancement of existing vegetation bounding the site, including hedgerows and the woodland copse adjacent to Downingbury Farm, with locally characteristic species and to fit with prevailing landscape character.

**4.224** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into the landscape, in

accordance with the landscape strategy for LCA 14 Pembury/Capel (Forested Plateau) of the TWB LCA (2017).

## **Potential to enhance beneficial use**

**4.225** Draft Policy AL/PE4 includes for the retention and enhancement of PRow WT218 that runs through, and is also adjacent to, the site; provision of links to the wider PRow network; provision of improvements to existing allotments, parks and recreation grounds, children's play space and youth play space. These measures would increase public access to remaining Green Belt land and would help deliver improved Green Infrastructure and biodiversity net gain, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).



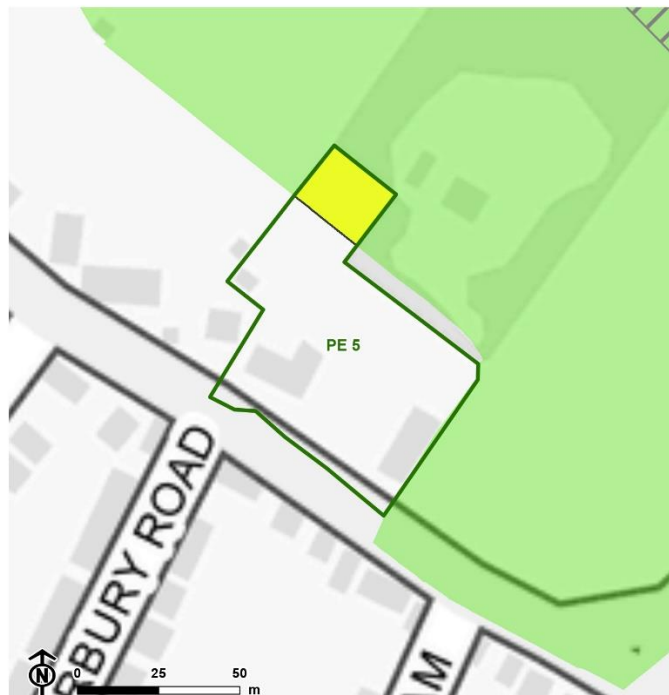
## AL/PE5: Land at Sturgeons fronting Henwood Green Road

- Green Belt
- Land released from Green Belt
- Draft Local Plan allocation
- Scheduled monument
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- SAC
- SSSI
- SPA
- Ancient woodland
- Registered parks and gardens
- Flood zone 3b
- Stage Two Study (2017)**
- Green Belt parcel
- Broad area



Map 1: Absolute Constraints

- Absolute constraints
- Rating**
- Very high
- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low



Map 2: Harm ratings

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## Allocation Summary

**4.226** AL/PE5 is located off Henwood Green Road on the eastern edge of Henwood Green and lies predominantly within the existing LBD of Pembury; only a small area to the north lies within the Green Belt. The land within the allocation comprises built forms in residential and employment use with associated hard-standing and ancillary buildings. It is defined to the south-west by Henwood Green Road; to the south-east by a low fence separating it from allotment gardens; to the north-west by a boundary with an adjacent residential property; and to the north-east by a tree belt and hedgerows separating it from a series of agricultural fields. The land lying within the Green Belt comprises an area of hardstanding defined by hedgerows on three sides, with no separating features between it and the area of the allocation lying within the LBD. The area to be released from the Green Belt falls within AONB.

**4.227** The site has planning permission (17/00756/FULL) for 19 units.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.228** The allocation site is predominantly located within the LBD. The area outside this within the Green Belt to the north has only weak distinction from the inset edge. There is no boundary feature to create separation from the inset area, the terrain and land cover are similar to the inset area, and views are dominated by urban development within the allocation site.

### Purpose 1: checking the sprawl of the large built up area

**4.229** The land has some urbanising development within it, has a weak distinction from the inset area, and is perceived as being within the large built up area of Pembury. It therefore makes a Weak contribution to checking the sprawl of the large built up area.

### Purpose 2: preventing neighbouring towns merging

**4.230** The land does not lie between neighbouring towns, meaning it makes No contribution to preventing neighbouring towns merging.

### **Purpose 3: safeguarding the countryside from encroachment**

**4.231** The land has some urbanising development within it and has a weak distinction from the inset area. Its usage is associated with the inset area, meaning the land makes a Weak contribution to safeguarding the countryside from encroachment.

### **Purpose 4: preserving the setting and special character of historic towns**

**4.232** The land does not form part of the setting of an historic town and therefore makes No contribution to preserving the setting and special character of historic towns.

### **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.233** All Green Belt land is considered to contribute equally to this purpose.

## **Impact on adjacent Green Belt land**

**4.234** The area to be released from the Green Belt comprises a small area to the north of the allocation site. Under the consented development, the area will be occupied by rear gardens and the existing hedges on the allocation boundary will be retained (as shown on the proposed site layout - Drawing 2769-07).

**4.235** The new Green Belt boundary will form a less consistent linear edge than the existing boundary, but the existing hedgerows defining the area (to be retained) mean the land is already perceived as having a strong association with the inset settlement.

**4.236** Release of the allocated land within AL/PE5 will result in an overall Negligible impact on the distinction of adjacent Green Belt land.

## **Harm summary**

**4.237** AL/PE5 makes a Weak contribution to checking the sprawl of the large built up area and to safeguarding the countryside from encroachment; and the impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/PE5 will be Very Low.

**Very Low**

**Variations in harm**

**4.238** No variations in harm are identified within AL/PE5.

**Potential mitigation measures**

**4.239** Draft Policy AL/PE5 includes for the retention/improvement of existing hedges to site where possible. No measures over and above those included within the Regulation 18 draft policy wording for Policy AL/PE5 are considered necessary.

**4.240** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 14 Pembury/Capel (Forested Plateau) of the TWB LCA (2017).

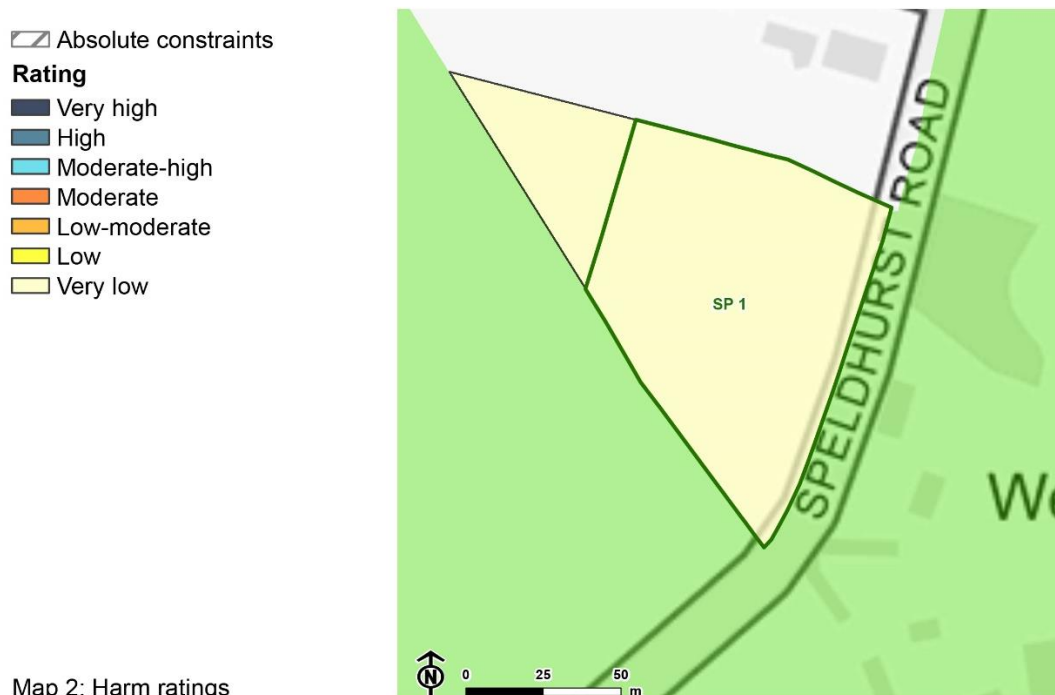
**Potential to enhance beneficial use**

**4.241** Draft Policy AL/PE5 includes for off-site amenity/natural green space and children's play space and improvements to existing allotments, parks and youth play space. These measures would increase public access to remaining Green Belt land (particularly the nearby allotments) and would help deliver improved Green Infrastructure, in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

## AL/SP1: Land to the west of Speldhurst Road and south of Ferbies



Map 1: Absolute Constraints



Map 2: Harm ratings

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## Allocation Summary

**4.242** AL/SP1 is located to the south of Speldhurst, adjoining the existing LBD. It comprises an arable field defined by the rear gardens of residential properties on Ferbies to the north; by hedgerows with mature trees lining Langton Road to the east; by a hedgerow featuring mature trees to the south-west; and by a hedgerow defining the rear garden of a residential property to the west. Immediately beyond Langton Road to the south-east there is a washed-over business park and to the east some washed-over built forms associated with a nursery, beyond which is a series of arable and pasture fields. The landscape to the west comprises several open arable fields divided by hedgerows. The allocation and adjacent land share a similar topography to the inset area of Speldhurst, occupying a flat/gently sloping plateau top, which falls away to distinctive wooded ghyll valleys further to the east and west. The allocation lies within the AONB.

**4.243** Land to be released from the Green Belt includes the entire allocation as well as a triangular area of land to the west of the allocation, comprising the rear gardens of properties on Ferbies.

## Contribution to the Green Belt Purposes

### Relationship with settlement

**4.244** The site does not extend far from the inset edge, where garden boundaries create a weak boundary feature, the terrain is similar to the inset area and land cover is not distinctive. The allocation also has some degree of urban containment owing to the presence of the urban area of Speldhurst to the north and washed-over development, including a business park, to the east and south-east. Neither the countryside nor urbanising development dominates views.

### Purpose 1: checking the sprawl of the large built up area

**4.245** The land is not close enough to the large built-up area for land to be associated with it, and more strongly relates to Speldhurst. It therefore makes No contribution to checking the sprawl of the large built up area.



## **Purpose 2: preventing neighbouring towns merging**

**4.246** The land does not lie between neighbouring towns. Whilst it lies in the gap between Speldhurst and Bullingstone to the west, and Speldhurst and Langton Green to the south, neither of these settlements are considered as towns in the context of Purpose 2. It therefore makes No contribution to preventing neighbouring towns merging.

## **Purpose 3: safeguarding the countryside from encroachment**

**4.247** The land is open and in the countryside, comprising a field in agricultural use, but has a weak distinction from the inset edge, with characteristics which relate more strongly to the urban area than to the countryside. The weaker the distinction from the urban area, the lesser the extent to which development would be perceived as encroachment on the countryside. Overall, the allocation area makes a Relatively Weak contribution to safeguarding the countryside from encroachment.

## **Purpose 4: preserving the setting and special character of historic towns**

**4.248** The land does not form part of the setting of Tunbridge Wells, and therefore makes No contribution to preserving the setting and special character of historic towns.

## **Purpose 5: assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

**4.249** All Green Belt land is considered to contribute equally to this purpose.

## **Impact on adjacent Green Belt land**

**4.250** The release of AL/SP1 will not extend the built-up edge of Speldhurst any further west than the existing LBD. Whilst it will increase the frontage of the inset edge with adjacent Green Belt land to the west, this is not sufficient to weaken its overall distinction from the inset area.

**4.251** Release will extend the new inset edge slightly further south than the existing LBD, bringing land in proximity to the south and south-east closer to the inset edge. However, this will replace an existing weak boundary (garden boundaries) with a moderate boundary (Langton

Road), meaning its impact on overall distinction of adjacent Green Belt land in parcel SP2b to the south and south-east will be minimal.

**4.252** Release will not extend the new inset edge any further east than the existing LBD; the new inset edge will also align with the current LBD to the north by being defined to the east by Langton Road.

**4.253** Release of the allocated land within AL/SP1 will result in an overall Negligible impact on the distinction of adjacent Green Belt land.

## Harm summary

**4.254** AL/SP1 makes a Relatively Weak contribution to the prevention of encroachment on the countryside, and the impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/SP1 will be Very Low.

**Very Low**

## Variations in harm

**4.255** No variations in harm are identified within AL/SP1.

## Potential mitigation measures

**4.256** The wording for Draft Policy AL/SP1 includes for the retention of hedgerows and the provision of a scheme that is sensitively designed and provides a suitable urban edge to the settlement. Further enhancement of the hedgerows defining AL/SP1 with locally characteristic species would help further reduce any potential visual influence of development on adjacent Green Belt land.

**4.257** These measures would help to reduce any potential visual influence of development on adjacent Green Belt land and would help to integrate development into the landscape, in accordance with the landscape strategy for LCA 5: Speldhurst (Wooded Farmland) of the TWB LCA (2017).

## Potential to enhance beneficial use

**4.258** The wording for Draft Policy AL/SP1 includes for the introduction of significant undeveloped green spaces, including appropriate landscape buffers, to site boundaries. This would increase public access and, with appropriate management, would help deliver improved GI. This would be in accordance with the Green Infrastructure Framework for Draft Local Plan – Regulation 18 (September 2019).

**4.259** In addition, should the hedgerows be enhanced, this would help integrate development into the landscape and make it appropriate to the rural character of land to the west. This would be in accordance with the landscape strategy for LCA 5 ‘Speldhurst Wooded Farmland’ of the TWB LCA (2017), and the guidance on mitigation and enhancement for sub-area SP18 of the TWB LSA (2017).

## Summary of harm assessment findings

**4.260** The findings of the assessment of harm, summarised in Table 4.1, show the potential degree of harm that would result if an allocation site was released.

**4.261** Detailed findings of the assessment of harm are set out in Chapter 4 above, organised by settlement. Where an allocation site lies adjacent to two settlements, the settlement to which it most closely relates has been used.

Table 4.1: Assessment of harm to the Green Belt purposes resulting from release of allocation sites

Allocation Site	Settlement	Overall Harm Rating
AL/RTW12: Land adjacent to Longfield Road	Tunbridge Wells	<b>Moderate</b>
AL/RTW13: Land at Colebrook House, Pembury Road	Tunbridge Wells	<b>Moderate</b>
AL/RTW16: Land at Wyevale	Tunbridge Wells	<b>Low-Moderate</b>
AL/RTW18: Land to the west of Eridge Road at Spratsbrook Farm	Tunbridge Wells	<b>Low-Moderate</b>
AL/RTW23: Land north of Hawkenbury Recreation Ground	Tunbridge Wells	<b>Moderate</b>
AL/RTWXX: Land to the north of Caenwood Farm, Speldhurst Road	Tunbridge Wells	<b>Low-Moderate</b>
AL/CA1: Tudeley Village	Tudeley Village	<b>High</b>
AL/CA3 and AL/PW1: Land at Capel and Paddock Wood	Paddock Wood	<b>High</b>

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Allocation Site	Settlement	Overall Harm Rating
AL/PW3: Land at Mascalls Farm	Paddock Wood	<b>Very Low</b>
AL/PE1: Land rear of High Street and west of Chalket Lane	Pembury	<b>Low</b>
AL/PE2: Land at Hubbles Farm and south of Hastings	Pembury	<b>Low</b>
AL/PE3: Land north of the A21, south and west of Hastings Road	Pembury	<b>Low</b>
AL/PE4: Land at Downingbury Farm, Maidstone Road	Pembury	<b>Low-Moderate</b>
AL/PE5: Land at Sturgeons fronting Henwood Green Road	Pembury	<b>Very Low</b>
AL/SP1: Land to the west of Speldhurst Road and south of Ferbies	Speldhurst	<b>Very Low</b>

# Chapter 5

## Assessment of strength of remaining Green Belt

### Introduction

**5.1** This chapter sets out an assessment of the combined effect of the release of proposed allocation sites, as proposed within the Tunbridge Wells Borough Draft Local Plan (Regulation 18 Consultation Draft), on the strategic functioning of the Green Belt within TWB.

**5.2** Green Belt is a strategic designation and whilst the release of individual allocation sites will lead to some harm to the Green Belt at a site level (as set out in Chapter 4), a key question is whether the cumulative release of sites will affect the overall ability of the remaining Green Belt to function as intended (that is, as defined by the Green Belt purposes in the NPPF). This chapter considers issues such as whether any key strategic gaps between settlements will be lost (Purpose 2), whether there is a sufficient band of remaining Green Belt to prevent future urban sprawl (Purpose 1) or to be perceived as countryside (Purpose 3), and whether the loss of sites will significantly affect the setting and special character of historic settlements (Purpose 4).

**5.3** In line with paragraph 141 of the NPPF, the new Local Plan for Tunbridge Wells Borough (TWBLP) will set out potential enhancements to the remaining Green Belt. This chapter will not comment on the potential enhancements to the Green Belt (this is considered at a site level for each allocation site in Chapter 4) but rather will only consider the extent to which the strategic function of the Green Belt is affected in relation to the NPPF Green Belt purposes. In addition, this report does not comment on the exceptional circumstances required for the release of land from the Green Belt.

### Approach

**5.4** In order to consider the potential impact of the Green Belt releases, the assessment considers the impact on the first four of the Green Belt purposes. This includes consideration of:



- Purpose 1 – the extent to which the revised Green Belt is still able to check the unrestricted sprawl of the large built up area: is there a sufficient band of remaining Green Belt to prevent future urban sprawl? Will there be any containment of land which will affect the role the Green Belt plays in preventing sprawl?
- Purpose 2 – the extent to which the Green Belt prevents neighbouring towns from merging with each other: will any key settlement gaps be lost by the proposed Green Belt releases?
- Purpose 3 – the extent to which the remaining Green belt will assist in safeguarding the countryside from encroachment: is there a sufficient band of remaining Green Belt to prevent future encroachment on the countryside? Will there be any containment of land which will affect the extent to which it is considered to constitute 'countryside'?
- Purpose 4 – the extent to which the setting and special character of historic towns will be preserved: will the Green Belt releases diminish the setting and special character of the historic towns?

**5.5** As noted above, Purpose 5 relates to the extent to which the Green Belt assists in urban regeneration by encouraging the recycling of derelict and other urban land. By preventing development within areas designated as Green Belt, the aim is to steer development to urban locations. A constrained land supply should also help make the recycling of derelict and other urban land more viable. In line with the 2017 Green Belt Study Stage Two, this Study acknowledges that whilst Purpose 5 is important, it is not possible to identify spatial variations in relation to the performance of Purpose 5 within the context of this assessment.

## Proposed allocations

**5.6** It is proposed that 15 sites across TWB will be allocated for development in the TWBLP, of which 14 lie entirely, or in part, within the Green Belt (see Figure 4.1: Draft Allocation Sites). The net area of land to be removed from the Green Belt is 408.660 ha with 1.084ha to be added, this equates to a net change of -407.573ha, or 5.71%, to the Green Belt in TWB.

**5.7** The harm of releasing each of these 14 proposed allocation sites from the Green Belt has been assessed in Chapter 4. The harm of releasing sites from the Green Belt considers the loss

of contribution of the land that is being released to the Green Belt in addition to the potential impact that the release of the land will have on the neighbouring Green Belt land.

**5.8** This cumulative assessment considers the strategic contribution to the Green Belt purposes of the remaining Green Belt, assuming that all the allocations are developed.

**5.9** The study does not set out ratings of the contribution, or the overall harm to the Green Belt purposes for remaining Green Belt land. Instead, it provides a qualitative assessment of the potential cumulative effects of the release of Green Belt allocation sites based on professional judgment, taking into account the findings of the Assessment of Harm (Chapter 4) and the 2017 Green Belt Study Stage Two.

**5.10** The Stage 2 Green Belt Study Stage Two (2017) assessed how the Green Belt contributes to the NPPF Green Belt purposes in relation to 10 broad areas (BAs) and 45 assessment parcels. In assessing the potential cumulative effects of the draft allocation sites on the strategic function of the Green Belt, this study comments on the extent to which there is an impact on the Green Belt purposes (1-4), with reference to BAs where relevant.

## Assessment of strength of remaining Green Belt

### Purpose 1: check the unrestricted sprawl of large built up areas

**5.11** Draft allocation sites AL/RTW12 and AL/RTW13 are located on the north-eastern edge of Tunbridge Wells, and AL/PE4 is located to the north of Pembury. Whilst the cumulative release of these allocation sites will in itself constitute urban sprawl, the remaining Green Belt land to the north-east of Tunbridge Wells and north of Pembury (BA2 and BA5 of the 2017 Green Belt Study Stage Two) will remain strongly distinct from the urban area. This is due to the presence of the A21 and A228 and/or mature woodland forming strong Green Belt boundaries; land extending a significant distance from the urban edge; and the presence of extensive areas of mature woodland (including Ancient Woodland) providing strong landcover distinction and reducing any potential urbanising visual influence of development.

**5.12** The cumulative release of these two draft allocation sites will not affect the overall ability of the remaining Green Belt land to the north-east of Tunbridge Wells and north of Pembury in

BA2 and BA5 to function as intended in respect to Purpose 1. Draft allocation AL/PE5 is located on the eastern edge of Pembury and constitutes only a small release of Green Belt land; strategically this would have little impact on the contribution the remaining Green Belt land to the east of Pembury in BA5.

**5.13** Draft allocation AL/RTW23 is located on the south-eastern edge of Tunbridge Wells, lying between the existing inset edge at Hawkenbury and High Woods; and draft allocations sites AL/PE1, AL/PE2 and ALPE3 are located on the southern edge of Pembury. Whilst the release of these allocation sites will constitute urban sprawl, the majority of remaining Green Belt land to the south-east of Tunbridge Wells and south of Pembury (BA6 of the 2017 Green Belt Study Stage Two) will remain strongly distinct from the urban area owing to landform distinction, including the valley of the River Teise and extensive woodland providing landcover distinction and reducing any potential urbanising visual influence of development. Furthermore, the A21 will form a strong Green Belt boundary to the south of Pembury which will prevent any further sprawl. The cumulative release of these draft allocation sites will not affect the overall ability of the remaining Green Belt land to the south-east of Tunbridge Wells and south of Pembury in BA6 to function as intended in respect to Purpose 1.

**5.14** Draft allocations AL/RTW16 and AL/RTW18 are located to the south-west of Tunbridge Wells. The latter is defined to the south-west by the boundary with Wealden District which also marks the extent of the Metropolitan Green Belt (that is, land to the south and south-west of Tunbridge Wells does not lie within the Green Belt). The cumulative release of these two allocation sites would not extend the inset edge of the LBUA any further to the west than the existing urban area at Ramslye.

**5.15** In the case AL/TRW18 the north-western half of the site will be retained within the Green Belt, and AI/RTW16 is located immediately north of Ramslye and is perceived as being within the large built up area. The remaining Green Belt land to the west of Tunbridge Wells and south of Rusthall and Langton Green (BA8 of the 2017 Green Belt Study Stage Two) will remain strongly distinct from the urban area, owing to the landform distinction provided by the valley of the River Grom; and the presence of extensive areas of mature woodland (including Ancient Woodland) forming a strong Green Belt boundary, providing strong landcover distinction and reducing any potential urbanising visual influence of development. Therefore, cumulative

release of these two allocation sites will not weaken the contribution the majority of the remaining Green Belt land to the west of Tunbridge Wells makes to checking the unrestricted sprawl of the large built up area.

**5.16** Overall, the cumulative release of draft allocation 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 neighbouring towns merging into one another**

**5.17** The Green Belt land lying between the eastern edge of Tunbridge Wells and western edge of Pembury forms a narrow gap and therefore plays a significant strategic role in preventing the two towns merging. This is aided by the presence of significant separating features, including the A21 and several woodland blocks (including Ancient Woodland).

**5.18** Draft allocation site AL/PE1, is located on the southern edge of Pembury, peripheral to this narrow gap; whilst draft allocation sites AL/RTW12 and AL/RTW13 are located on the north-eastern edge of Tunbridge Wells where the gap between the towns is wider and with extensive woodlands, higher ground and the A21 providing strong separating features. The cumulative release of these allocation sites 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 cumulative release of the allocation sites between Tunbridge Wells and Pembury will therefore not increase the contribution the remaining Green Belt land makes to preventing the towns merging into one another.

**5.19** The Green Belt land between Tonbridge and Paddock Wood currently forms a wide gap (approximately 6km) between the two towns, albeit with rail and road connections reducing the perceived gap. The release of AL/CA1, located roughly equidistant between Tonbridge and Paddock Wood; and AL/PW1, located on the western edge of Paddock Wood, will cause a narrowing of this gap. Despite being developed on Garden Village principals, 'Tudeley Village'

(AL/CA1) will form a new inset settlement of a size comparable to Pembury and Paddock Wood, and as such will constitute a 'town' in respect to Purpose 2.

**5.20** The release of approximately 183ha as part of AL/CA1 will create a new gap of approximately 1.75km between Tudeley Village and Tonbridge, with the rail and road connections reducing the perceived gap despite separating features that would remain (including rising topography and numerous woodland blocks). However, there will still be strong Green Belt separation between Tonbridge and Tudeley Village.

**5.21** The release of AL/CA1 in combination with the release of approximately 148ha as part of AL/PW1, will create a gap of approximately 1.8km between Paddock Wood and Tudeley Village, but with intervening urban development at Five Oak Green; washed-over development on Badsell Road; rail and road connections; and a lack of significant separating features to reduce the perceived gap, particularly between Tudeley Village and Five Oak Green. Whilst the cumulative release of these two allocation sites 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.

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

**5.22** 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 areas will not mark a step change in the settlement extent, that is to say development will occur on land with an existing physical and/or visual relationship with the urban areas.

**5.23** The cumulative release of the draft allocation sites (including AL/RTW12, AL/RTW13, AL/RTW16, AL/RTW18, AL/RTW23, AL/PE1, AL/PE2, AL/PE3, AL/PE4, AL/PE5 and AL/SP1) will not weaken the contribution or affect the overall ability of the majority of the remaining Green Belt land surrounding Tunbridge Wells, Pembury and Speldhurst to function as intended in respect to Purpose 3. A sufficient band of Green Belt will remain which will continue to be

perceived as countryside. This is reflected in the assessment of impact on adjacent Green Belt land for each of the allocation sites, as set out in Chapter 4.

**5.24** Furthermore, the landscape around Tunbridge Wells, Pembury and Speldhurst has a notable landform and is well-wooded, which creates a sharp transition between urban and rural land. The distinctiveness of the landscape is reflected in much of the area being covered by the High Weald AONB designation.

**5.25** Draft allocation site AL/PW1 comprises approximately 148ha of open arable farmland on the western, north-western and northern edge of Paddock Wood; and AL/CA1 comprises approximately 183ha of open agricultural land located roughly equidistant between Tonbridge and Paddock Wood (as noted, the latter will form a new inset area). The release of these large areas in itself will represent a substantial encroachment on the countryside, but additionally the cumulative release will leave only a narrow bands of Green Belt land (measuring as little as 425m wide) between each of the allocation sites and the inset area of Five Oak Green (located between AL/CA1 and AL/PW1).

**5.26** The remaining Green Belt land will therefore be located in closer proximity to an inset edge, will lack strong landform and landcover distinction, and development will have an urbanising visual influence. Release of the allocations at Tudeley Village and Paddock Wood 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**

**5.27** 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. None of the draft allocation sites lie in proximity to Tonbridge; AL/CA1 is the closest, but being located at over 3km from the historic focus of the town (that is, the spur of higher ground alongside which the River Medway that formed a strategically important crossing point and saw the construction of a castle in the 11th century) does not form part of the setting for the historic town.



**5.28** Draft allocation sites AL/RTW12 and AL/RTW13 to the north-east of Tunbridge Wells and AL/RTW16 to the south-west form only minor elements in the historic setting of the town. Being located on opposite sides of the town, their cumulative release will not weaken the contribution or affect the overall ability of the remaining Green Belt land surrounding the town to function as intended in respect to Purpose 4.

**5.29** AL/RTW18, which is located to the south-west of Tunbridge Wells Common, contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting. Similarly, AL/RTW23, which is located to the south-west of the town, contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting; as well as being an element in views from Dunorlan Park (a Registered Park and Garden) of the open ridgeline forming the foreground to High Wood. However, as these two allocation sites are located on opposite sides of the town, 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 in respect to Purpose 4.

## Potential measures to strengthen remaining Green Belt

**5.30** As noted above, the remaining Green Belt land between AL/CA1 (Tudeley Village) and Five Oak Green will be less robust than it is at present. Its contribution to Purpose 3 will be weakened, and its contribution to Purpose 2, although it will be higher than at present as a result of the diminished settlement gap, will still reflect a stronger relationship with adjacent urban areas than would otherwise be the case.

**5.31** In order to strengthen the remaining Green Belt land between Tudeley Village and Five Oak Green a number of measures could be taken to help maintain a strong distinction between the two. This could include: open space and structural landscaping and buffers (using locally characteristic planting) within AL/CA1 to the east to reduce impact on perceived separation; higher density of development around the new settlement centre, with lower density development on the periphery to the east, to reduce any urbanising effects of development; the

need to maintain a visual separation between Tudeley Village and Five Oak Green; a reduction in the urbanising effect of development when travelling along the B2017 between the two settlements by enhancing roadside planting using locally characteristic woodland copses, belts and hedgerows, and through use of set-back and appropriately designed road infrastructure; the introduction of a village-like character within AL/CA1, through the application of 'garden settlement' principles; ensuring new development is designed sensitively with views and local character considered; and use of sustainable drainage features to define/enhance separation between settlement and countryside, integrating with the existing pattern of dykes and streams.

**5.32** The release of AL/PW1, along with the allocation of other land around the town to the north, east and south-east, will mean that the town of Paddock Wood will grow significantly. 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.

# Chapter 6

## Summary and Next Steps

### Introduction

**6.1** This chapter provides a brief summary of the findings of this Stage 3 Green Belt study and sets out the next steps that the Council will need to consider if making changes to the Green Belt.

### Summary

**6.2** This Study builds on the Stage 1 and Stage 2 Green Belt Assessments published in 2016 and 2017 and provides a more refined and focussed assessment of the potential harm of releasing a number of potential site allocations within the Borough (see Chapter 4). It also identifies a number of mitigation measures to reduce the potential harm to the Green Belt and opportunities to enhance the remaining Green Belt. Chapter 5 includes a strategic assessment of the cumulative effect of the release of the proposed site allocations on the strategic functioning of the Green Belt within the Borough.

**6.3** The findings of the assessment of harm are summarised in Table 4.1 in Chapter 4 and depending on location, range from low harm associated with the release of land around Speldhurst and Pembury, to very high harm at Tudeley Village and Paddock Wood.

**6.4** The assessment of the cumulative release of draft allocation sites concludes that:

- 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 and AL/PW1 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.

## Next steps: making changes to the Green Belt

**6.5** The NPPF requires changes to the Green Belt to be made through the Development Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, that is to say planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.

**6.6** A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes. In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, higher performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.

**6.7** Before concluding that 'exceptional circumstances' exist to justify changes to the Green Belt, Paragraph 137 of the NPPF states that local authorities should demonstrate that all other 'reasonable options' for meeting its identified need for development have been considered. In particular local authorities need to consider whether their strategy:

- makes effective use of suitable brownfield sites and underutilised land;
- optimises the density of development in town and city centres and other locations well served by public transport; and
- explores whether other authorities can help to meet some of the identified development requirement.

**6.8** Should the Council decide to release land from the Green Belt, careful consideration also needs to be given to the form of the amended Green Belt boundaries. As set out in Para 139 of the NPPF:

"When defining Green Belt boundaries, plans should:

- ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

**6.9** Further guidance on establishing the necessary 'exceptional circumstances' for making alterations to Green Belt boundaries is set out in the recent High Court judgement: *Compton Parish Council and others v Guildford Borough Council and others* (2019). This involved an appeal opposed to the principle and extent of land proposed for release from the Green Belt in the Council's submitted Local Plan. The judge concluded:

- "There is no definition of the policy concept of 'exceptional circumstances' for altering Green Belt boundaries. This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case."
- "The 'exceptional circumstances' can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary...there will almost inevitably be



an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy.”

**6.10** This study has assessed the harm to the Green Belt purposes of releasing land for development, predominantly at the settlement-edges to facilitate the expansion of the urban area and inset settlements. The findings of this study will form an important piece of evidence for the emerging Local Plan.

**6.11** However, as outlined above there are other important factors that need to be considered when establishing exceptional circumstances for making alterations to Green Belt boundaries, most notably sustainability, viability and deliverability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in high harm to the Green Belt. In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.

**6.12** This report has also considered potential measures to mitigate harm to the Green Belt, as well as opportunities to enhance the beneficial use of the remaining Green Belt. When considering potential enhancements, it is also important to ensure that the enhancements can be delivered i.e. that landownership/management issues have been resolved and that the costs of their implementation have been factored into the viability of sites. These will be matters for further consideration by the Council.

## **Appendix A**

# **Draft Masterplan Documents**





No development is proposed in the floodplain along the northern edge of the site. Instead, this area will become available for informal recreation.

A railway station is proposed in the central area of the village, with a 10 minute walking distance from any point within the new settlement.

A cricket club has been proposed on the landscaped northern edge of the site.

The railway line edge is a great opportunity to provide an informal response and lose the rigidity of such a dominant feature on the ground. Allotments, community gardens and orchards are proposed in these areas with houses arranged informally around them.

In the central and northern areas of the site, there are fewer physical constraints so more regular, formal street patterns can be proposed to create an interesting contrast with the southern portion of the village.

Secondary School: located at the eastern edge of the site, in close proximity to Capel Primary School.

A Sports Centre is proposed close to The George & Dragon, complementing the nearby secondary school and accessible to residents of Five Oak Green.

The character of the southern portion of the village is informal in nature, and responds to existing key features on the ground. Roads and lanes are short and informal and a variety of homes are proposed.

The village centre and market square is a mixed-use space that offers a range of commercial opportunities together with key community buildings and a variety of house types.

The Village Green will be a key element in the first phase of the new village. Its design invokes the precedents set by traditional village greens in the local area (such as Hawkhurst and Benenden), to protect the setting of All Saints Church and provide a focus for village life.

The Primary School is centrally located, within 5 minute walking distance to the new railway station and village centre. The nursery building is strategically placed to establish a "dialogue" with All Saints Church, on the opposite side of the village green. The existing footpath that traverses the site provides direct pedestrian access from the Church.



Potential Area for Strategic Growth

➔

Main Vehicular Routes

➔

Vehicular Access Points

----

Bus Routes

⊗

Bus Gate

➔

Pedestrian / Cycle Routes

⊗

Improved Pedestrian Crossing

↔

Pedestrian Links to Local Community

Landscape Features:

Green & Blue Strategic Landscape Corridors

SUDS

Flood Management Measures

Significant Woodland

Views:

➔

Views Out

Development Areas:

Proposed Development Areas

Proposed Sports Hub Area

LC

Local Centre

PS

Primary School

Existing Town Centre

Site of Historic Importance to be Protected

Consented Developments:

1

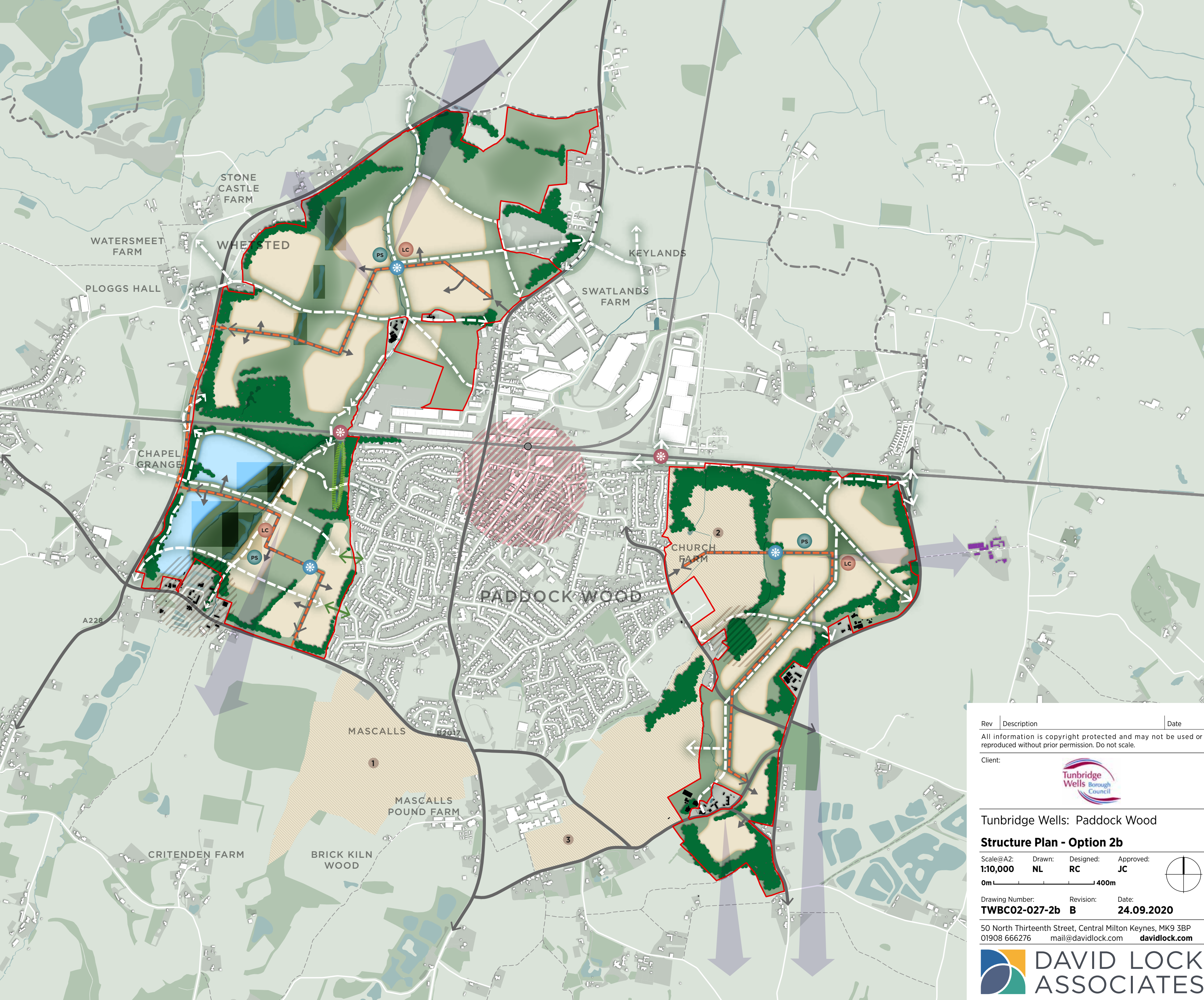
Mascalls Residential Site: 476 Houses

2

Church Farm Residential Site: 300 Houses

3

Residential & Secondary School Expansion Site: 350 Houses & 1 x FE School



Rev	Description	Date
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Client:



Tunbridge Wells: Paddock Wood

Structure Plan - Option 2b

Scale@A2: 1:10,000	Drawn: NL	Designed: RC	Approved: JC
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0m 400m

Drawing Number: TWBC02-027-2b	Revision: B	Date: 24.09.2020
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