

Tunbridge Wells Borough Green Belt Strategic Study

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1 Purpose and Requirements of the Study

Project Context

- 1.1 Tunbridge Wells Borough Council (TWBC) is currently preparing a new Local Plan that will guide future development in the borough up to 2033. The new Local Plan will replace the existing 2006 Local Plan, the Core Strategy and the associated DPDs. As the initial part of the process, the Council is gathering evidence, including evidence for housing, the local economy, retail and the environment.
- 1.2 The Strategic Housing Market Assessment (SHMA) has already been completed, giving an indication of the number of new homes that may be needed within the borough. For Tunbridge Wells Borough, the SHMA identifies a "*full objectively-assessed need*" for 648 homes per year over the 2013-33 period¹.
- 1.3 The NPPF requires that Councils ensure that there is sufficient land available in sustainable locations to meet the housing requirements. There are a number of existing planning restrictions in Tunbridge Wells Borough, with much of it covered by AONB and/ or Green Belt designation, whilst its location close to London and within the south-east puts it under considerable pressure for potential growth.
- 1.4 Green Belts have been part of national planning policy since 1955. The Green Belt around Tunbridge Wells has been in existence since the formal approval of the Kent Structure Plan in 1980 and the broad extent of the Green Belt in the Borough has essentially remained unchanged since then (see fuller history in Chapter 2).
- 1.5 National policy requires that Green Belts can only be changed in exceptional circumstances, through Local Plan reviews: paragraph 83 of the National Planning Policy Framework (NPPF) requires local planning authorities to consider Green Belt boundaries when reviewing their Local Plans, "...*having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*", although alterations should only be made "*in exceptional circumstances*".
- 1.6 Since TWBC is currently reviewing its Local Plan, the Council has taken the opportunity to review the Green Belt designation in the context of changes in the Borough since 1980 and potential future changes which may be required to accommodate a growing population.

Project Scope

- 1.7 The scope of this review includes a strategic assessment of the Green Belt in the Borough of Tunbridge Wells in the context of the wider Metropolitan Green Belt and Green Belt within adjacent local authorities. The assessment is undertaken in relation to the contribution of areas of land to each of the five Green Belt Purposes.
- 1.8 The review will include consideration of whether, and for which areas, a further 'Stage Two' Green Belt review should be undertaken; this would comprise a more detailed and focussed review of parcels of land around identified settlements.
- 1.9 This review does not itself determine whether or not land should remain or be included in the Green Belt, as this is the role of the Local Plan, which takes into account all the relevant planning considerations. This includes whether there are exceptional circumstances for altering existing boundaries.

¹ Sevenoaks & Tunbridge Wells Strategic Housing Market Assessment, September 2015, GL Hearn Limited.

1.10 It is not the role of this review to establish whether or not such exceptional circumstances exist. However, by establishing the extent to which areas of Green Belt fulfil the Purposes for which it was designated, this is intended to inform further decisions on whether any of the Borough's Green Belt should be amended.

Report Structure

1.11 The following chapters:

- Set out the planning context in terms of Green Belt policy and its application in the Borough of Tunbridge Wells, also with reference to the Green Belt in neighbouring districts (**Chapter 2**);
- Describe the methodology used for this study and its basis with reference to the NPPF, available guidance and inspectors' reports (**Chapter 3**);
- Consider the relationships between settlements and countryside in the Borough (**Chapter 4**);
- Assess, at a strategic scale, the contribution of land to Green Belt purposes (**Chapter 5**);
- Identify broad areas of land considered to make a strong contribution to Green Belt, consider the scope for changes to the status of settlements within the defined area (in terms of their inclusion or exclusion), address the justification for boundary changes and the relationship with Green Belt in neighbouring districts, and suggest parcels of land that could be assessed as a 'Stage Two' study (**Chapter 6**).

2 Planning Context

- 2.1 Green Belt is a national planning designation for controlling the growth of urban areas. In south east England, at a strategic level, this means the restriction of the outward expansion of London, and retention of its separation from surrounding urban areas; the Green Belt here is known as the Metropolitan Green Belt.
- 2.2 This chapter summarises the key Green Belt policies.

National policy

- 2.3 The current national planning policy for Protecting Green Belt land is set out in Section 9 of the NPPF. Fundamentally this policy is unchanged from the Planning Policy Guidance which preceded it (PPG2 Green Belts). Paragraph 79 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'.
- 2.4 Paragraph 80 defines five purposes, of Green Belt as:
 - 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; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.5 Any construction of new buildings in the Green Belt is considered inappropriate, unless it falls into one of the categories of exception listed in Paragraphs 89 and 90 of the NPPF.
- 2.6 In December 2015, a Government consultation proposed amendments to Green Belt policy so that Neighbourhood Plans could allocate "appropriate small-scale sites" in the Green Belt specifically for 'Starter Homes', with neighbourhood areas having the discretion to determine the scope of a small-scale site. The consultation also proposed amendments to the policy test in Paragraph 89 of the NPPF that prevents development of brownfield land where there is any "*additional impact on openness of the Green Belt*". The change aims to give more flexibility and enable "*suitably designed redevelopment to come forward...where any harm to openness is not substantial.*" Only relevant to the delivery of 'Starter Homes', and subject to local consultation, this change aims to prioritise the regeneration of previously developed brownfield sites in the Green Belt by allowing them to be developed in the same way as other brownfield land.²

Evolution of the Metropolitan Green Belt

- 2.7 The principle of maintaining a ring of open country around London can be traced back to the 16th 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 referred to "*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 HM Government, Consultation on proposed changes to national planning policy, December 2015

- 2.8 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 London were purchased by the London County Council and adjacent counties, either individually or jointly.
- 2.9 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.
- 2.10 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, the flood gates were opened for country areas around provincial towns and cities to bring forward proposals for new Green Belt. 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.
- 2.11 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.

History of Green Belt in Tunbridge Wells Borough

- 2.12 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.
- 2.13 The area to the south of Tunbridge Wells lies in East Sussex County and there is little information available on whether there were proposals for any of the land to be added as Green Belt. However, there is a suggestion that East Sussex submitted preliminary proposals for areas of new Green Belt between 1955 and 1960 which were rejected by central government³ at the time.

Kent Structure Plan (1980)

- 2.14 The Kent Structure Plan was approved by the Secretary of State in April 1980. The outer extent of the Green Belt was indicated generally in the Structure Plan key diagram. The following policies for the Green Belt were included within the Structure Plan:
- *MGB1: The Metropolitan Green Belt will generally extend for a depth of about 15 miles from the edge of the built-up area of Greater London, that is, to the east of Gravesend, to the west of Rochester, to the west of West Malling, and to the east of Wateringbury and Nettlestead, but, exceptionally, extending to the west of Paddock Wood and east of Tunbridge Wells.*
 - *MGB2: Within the Green Belt, there will be a strong presumption against permitting new development outside the presently defined extent of urban areas and the present built-up*

³ ‘Planning and Urban Change’, Ward, S., 2nd Edition, Sage Publications, 2004.

extent of any village, unless it conforms with the open recreation functions of the Green Belt or is directly related to agriculture or other uses appropriate to a rural area. Any development approved within the Metropolitan Green Belt will be required to be sited and designed so as to maintain the open character of the area.

- 2.15 An Explanatory Memorandum to the Structure Plan quoted by the Royal Tunbridge Wells and Southborough Local Plan (1988) elaborates on these functions, the function of the Green Belt around Royal Tunbridge Wells and Southborough being to "...restrain the further expansion of Royal Tunbridge Wells (including Southborough, Pembury and Speldhurst) ... and to preserve the identity and setting of these and other rural settlements."

Kent Countryside Local Plan, 1983

- 2.16 The Kent Countryside Local Plan provided further detail on the Structure Plan Green Belt policies in Chapter 5 and Appendix 1. This included a statement of the main function of the Metropolitan Green Belt "*to preserve a belt of open country beyond the edge of Greater London, and to restrain the outward growth of settlements in West Kent within influence of London*". It also stated that the Green Belt "*also provides an area within which to meet the recreation needs of the metropolitan population and those living within the built up areas of West Kent, but avoiding farmland of importance to agriculture*" (however, the recreation purpose of the Green Belt is no longer stated within national planning policy).
- 2.17 The objectives of the Metropolitan Green Belt, as set out in Appendix 1 of the Plan were as follows:
- i. support regional policy aiming to contain further development of the metropolis;
 - ii. restrain housing and employment growth in those parts of Kent closest to London;
 - iii. maintain and enhance an area of mainly open country around London and between London and the Mid Kent growth point; and
 - iv. promote recreation facilities, to the benefit of both Londoners and those living in the built-up areas of West Kent, particularly at the urban fringe, but avoiding farmland of importance to agriculture.

"The extent of the MGB does not relate to areas of special significance for countryside conservation or the factors which contribute to their definition. Its effect is to provide additional protection against development where such areas abut settlements and to maintain open country not subject to such policies. Because the definition of the MGB should be related to its functions and because it is an administrative instrument defining an area of development restraint, extensive use can be made of administrative boundaries in defining the outer boundary of the MGB".

Royal Tunbridge Wells and Southborough Local Plan (1988)

- 2.18 It was the responsibility of the local District Councils to define the inner boundaries of the Green Belt and make due allowance for urban growth needs. The Tunbridge Wells Green Belt was described and defined in the Royal Tunbridge Wells and Southborough Local Plan, 1988, including Rural Fringe sites identified in order to provide sufficient safeguarded land to meet the longer-term needs for development beyond the Plan period.

Paddock Wood Local Plan (1984)

- 2.19 The Paddock Wood Green Belt defined the Green Belt to the west of the town within the 1984 Local Plan, which reproduced the outer boundary of the Green Belt as defined by the Kent Countryside Local Plan. In this instance the outer Green Belt boundary of the Kent plan was also the inner boundary of the settlement of Paddock Wood.

Current Green Belt Policy

Tunbridge Wells Borough Local Plan (2006)

- 2.20 Following abolition of County Structure Plans and Regional Spatial Strategies, Green Belts are currently defined in local authorities' Local Plans. The 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.
- 2.21 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 and villages. The Plan states that Regional Planning Guidance for the South East (RPG 9 which was current at the time of the Plan) confirmed that MGB still had an important role in preventing urban sprawl and the coalescence of settlements and in protecting the countryside, as well as promoting urban regeneration and renewal. The studies carried out in advance of the 2006 Plan⁴ indicated that the Borough could accommodate all necessary development without the need to modify the MGB boundaries and that the purposes of the Green Belt remain relevant for the Plan period.
- 2.22 The Plan acknowledges the other existing policies that offer similar protection:
- Protection of the landscape within the High Weald AONB (which includes a large proportion of the Green Belt in Tunbridge Wells Borough) under national and regional guidance.
 - Safeguard the setting of historic towns and villages (under RPG9)
 - Conservation of the setting of Royal Tunbridge Wells (strategic planning policy).
- 2.23 Safeguarded areas of long-term land reserve, the Rural Fringe, are set out in Local Plan Policy RF1. 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. Policy AL/GB4 designates land as Rural Fringe (in effect carrying 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).

Green Belt in Neighbouring Districts

Sevenoaks

- 2.24 Approximately 93% of Sevenoaks Borough is designated as Green Belt. The Borough is currently undertaking a Green Belt Review, the methodology for which includes the definition of assessment parcels to coincide with strong physical boundary features regardless of the district boundary location. Their proposed assessment parcels therefore include four which extend into Tunbridge Wells Borough:
- Parcel 1 includes the area to the north of the A264 west of the B2188 (near Langton Green);
 - Parcel 2 includes the area to the north of the B2188 as far east as Langton Green and Speldhurst (joined by Speldhurst Road);
 - Parcel 6 includes the area south of the B1276, west of Barden Road and north of the stream that crosses Barden Road at Bardenmill Farm;
 - Parcel 10 includes the area north of the B1276, south of the A21 and west of Hayesden Lane.

Tonbridge and Malling

- 2.25 Approximately 71% of Tonbridge and Malling Borough is designated as Green Belt. A Green Belt study⁵ was published in September 2016. The assessment parcels defined in this study do not

⁴ Tunbridge Wells Borough Urban Capacity Study (2001)

⁵ Tonbridge and Malling Borough Council Local Plan - Green Belt Study (Tonbridge and Malling Borough Council, 2016)

extend across the Borough boundary, but three of the four parcels defined around the edges of Tonbridge also abut Tunbridge Wells Borough. These parcels were assessed against the first four of the five purposes of Green Belt listed in Paragraph 2.4 above.

- 2.26 Parcel TO3, to the south-west of Tonbridge, is assessed as making a 'moderate' contribution to all Green Belt purposes. The assessment does not specifically identify variations in contribution within the parcel, but does note the role played by the A21 (which passes through the parcel) in checking sprawl and in safeguarding the countryside from encroachment. The area between the urban edge at Brook Street and the hamlet of Lower Haysden, the northern part of this parcel, is identified in the District's Issues and Options consultation paper⁶ as having potential for development.
- 2.27 Parcel TO4, to the south of the town, is assessed as making a 'moderate' contribution to preventing towns from merger and to safeguarding countryside, and 'limited or no contribution' to the other two assessed purposes. With regard to the prevention of sprawl the A21, which forms the northern edge of most of the parcel, is noted as being a significant boundary; this reflects an assessment approach in which the Green Belt designation is considered to make a weaker contribution when landscape elements, and also in this case the AONB designation, play a strong role. There is no suggestion in the Issues and Options consultation of any development potential to the south of the A21, but a location is suggested to the north of this road and another to the north of the A26.
- 2.28 Parcel TO5, to the east of the town, is assessed as 'performing well' in the checking of sprawl and safeguarding countryside from encroachment, making a 'moderate' contribution to preventing the merger of towns and making 'limited or no contribution' to preserving the setting and special character of historic towns. The relationship between this area and the wider countryside to the east is considered strong, and there are no strong physical boundaries (such as the A21) or designations (such as AONB) to restrict sprawl. The Issues and Options document suggests development potential to the north of the railway line, extending eastward as far as a watercourse on the western side of Railway Shaw and so leaving a gap of c.150m to the boundary with Tunbridge Wells Borough.

Maidstone

- 2.29 A Green Belt review was carried out for Maidstone Borough in January 2016⁷. The review concluded that the Borough has maintained its openness and continues to perform some of the purposes of the Green Belt. No exceptional circumstances for reviewing the Green Belt boundaries within Maidstone Borough were found.
- 2.30 There is only a small area of Green Belt in Maidstone, and it is not contiguous with the Tunbridge Wells Green Belt.

Wealden

- 2.31 There is no Green Belt in Wealden District.

⁶ Tonbridge and Malling Borough Council Local Plan - The Way Forward (Tonbridge and Malling Borough Council, 2016)

⁷ Maidstone Borough Council Green Belt Review (2016)

3 Assessment Methodology

- 3.1 The following paragraphs set out the considerations that have informed our approach to Green Belt assessment, and the methodology used to undertake the strategic assessment.

Guidance

- 3.2 Neither the National Planning Policy Framework nor National Planning Practice Guidance provides guidance on how to undertake Green Belt reviews, but the NPPF includes paragraphs relating to the designation and alteration of Green Belts, and to types of development which can be considered 'not unacceptable'. These, together with Examination Inspectors' reports and case law which reference them, can be used to inform assessment approaches. Additionally the Planning Advisory Service (PAS)⁸ and Planning Officers Society⁹ have both published notes which provide useful discussion of some of the issues. These sources are referenced in the paragraphs below.

Assessment Considerations

- 3.3 There are two aspects relating to the fundamental aim of Green Belt which we can assess: the extent to which land has been kept free from urban sprawl and the extent to which it is necessary to keep land open in order to prevent future urban sprawl.

Openness and Permanence

- 3.4 Where development has taken place on Green Belt land there is potential for this to be considered urban sprawl, but it could also be the case that development that has taken place does not compromise openness and does not therefore contravene the fundamental aim of Green Belt policy.
- 3.5 Openness in a Green Belt sense relates to lack of built development more than visual openness, although the two often go hand in hand. The key distinction is that where vegetation provides visual enclosure this does not reduce Green Belt openness, even though it might in practice mean that development would have less visual impact¹⁰. However it does not therefore follow that visual openness is not a consideration in the judgement of impact of development on the Green Belt. An Inspector has stated that "*The question of visual impact is implicitly part of the concept of "openness of the Green Belt"*"¹¹.
- 3.6 Not all built development is considered to impinge on openness. Green Belt land includes many buildings which, by virtue of their form and arrangement in relation to other development, are considered not to be incompatible with a Green Belt location. This applies most commonly to rural villages, hamlets and farmsteads, where the scale, form and density of existing development is such that it can be considered to be part of the countryside, rather than an extension of the urban/settled area, or a built-up area in its own right. Most development of this kind pre-dates the establishment of the Green Belt, but the NPPF allows (at Paragraph 89) for "*limited infilling*".
- 3.7 The NPPF identifies (in Paragraph 89) a number of other types of new development which are exceptions to the rule that new buildings are inappropriate in the Green Belt, the most significant being:

⁸ Planning on the Doorstep: The Big Issues –Green Belt (Peter Brett for Planning Advisory Service, 2015)

⁹ Approach to Review of the Green Belt (Planning Officers Society)

¹⁰ This point is made in paragraph 22 of the judgement in *Heath & Hampstead Society v London Borough of Camden [2007] EWHC 977 (Admin)* (3rd April 2007)

¹¹ Paragraph 15 of *Turner [2016] EWCA Civ 466*, Arden, Floyd and Sales LJ

- Buildings for agriculture or forestry;
 - Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
 - Infilling or redevelopment of previously developed sites (i.e. ‘brownfield land’), provided it does not result in any increased impact on openness, or conflict with the purposes of including land in the Green Belt.
- 3.8 It is important to note that the exception for buildings for agriculture and forestry has no condition requiring openness to be preserved. The implication of this, supported by case law¹², is that such development cannot be considered, regardless of size or location, to weaken contribution to Green Belt purposes¹³.
- 3.9 The concept of ‘permanence’ is to an extent a planning consideration than a physical one – reflected in the text from the Kent Countryside Local Plan quoted in Paragraph 2.12 above – but the NPPF, at Paragraph 85, requires local planning authorities to use ...”physical features that are readily recognisable and likely to be permanent” when defining new boundaries.
- ### **Contribution to Green Belt Purposes**
- 3.10 Where land remains open we can question the extent to which it is necessary to retain this openness in order to prevent sprawl (noting the NPPF’s requirement, at Paragraph 84, for Green Belts to “... not include land which it is unnecessary to keep permanently open”). In part this judgement is dependent on assessment of the likelihood of sprawl occurring in the absence of protective designation – a consideration of development need which lies beyond the scope of this study – but by identifying spatial variations in the extent to which land meets the purposes of Green Belt we can help to inform decisions regarding the most appropriate locations for Green Belt boundaries.
- 3.11 Inspectors’ findings validate this approach, indicating that Green Belt studies should make clear “how the assessment of ‘importance to Green Belt’ has been derived” from assessments against the individual purposes of Green Belt.¹⁴ Such assessments against the purposes should form the basis of any justification for releasing land from the Green Belt.¹⁵ Green Belt reviews should also be ‘comprehensive’ rather than ‘selective’.¹⁶
- 3.12 In making judgements on relative contribution to Green Belt purposes, no consideration is given to the potential effects of development beyond the five stated purposes, but when reviewing boundaries, local authorities are required to “... consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary” (NPPF Paragraph 84). This judgement will require an analysis of factors such as highway capacity, location of amenities and services, and effects on landscape and ecological resources, with all of these factors considered against the need-case for development, so a review of Green Belt contribution is only one aspect of the review process.
- 3.13 The POS publication stresses the distinction between Green Belt purposes, considerations relating to “the intrinsic quality of the land” and the need for the Green Belt review process to identify sustainable locations for development, and makes the point that in suitably sustainable locations “...the case for new development will normally outweigh the purposes of the Green Belt”.
- 3.14 This assessment can be extended to consider whether land outside of current boundaries, either ‘inside’ – i.e. adjacent to settlements ‘inset’ within the Green Belt – or ‘outside’ – i.e. beyond the outer edge of the designated area – might make sufficient contribution to Green Belt purposes to be considered for inclusion.

¹² Lee Valley Regional Park Authority v Epping Forest District Council - case no.C1/2015/1430.

¹³ Although Lee Valley Regional Park Authority v Broxbourne Borough Council – case no.CO/2496/2014 – shows that where land use has gone beyond agricultural production into retail sales it becomes ‘previously developed land’ which can, through subsequent development, potentially have an adverse impact on openness.

¹⁴ Inspectors’ Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)

¹⁵ Inspector’s interim findings (H Stephens) to Durham City Council (November 2014)

¹⁶ Inspector’s report (A Thickett) to Leeds City Council (September 2014)

- 3.15 The following paragraphs examine assessment considerations relating to each of the Green Belt purposes identified in NPPF Paragraph 80.

Considerations relating to checking the unrestricted sprawl of large built-up areas (purpose 1)

- 3.16 Definitions of sprawl vary, but the implication of the terminology is that restricted development may not contravene this purpose. The PAS advice note, for example, poses the question "... *is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?*" However, in assessing the contribution land makes to preventing sprawl no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.
- 3.17 Landscape elements or other designations or constraints, such as AONB or flood plain, can affect the likelihood of sprawl occurring; in such cases some assessment methodologies, e.g. that used in Tonbridge and Malling¹⁷, judge the Green Belt to make a weaker contribution to Purpose 1. However an alternative approach is to consider land separated from a large built-up area by some physical element (such as a major road) to make a stronger contribution, in that development extending into this area would be more readily perceived as sprawl than development that had a closer relationship with the urban area. The PAS advice note comments that land might make a limited contribution where "*it would effectively be 'infill', with the land partially enclosed by development*".
- 3.18 Definition of what constitutes a large built-up area can also vary, but it is clear that it does not relate to smaller towns or villages.

Considerations relating to preventing the merger of neighbouring towns (purpose 2)

- 3.19 An area of that represents all or most of the physical gap between towns will clearly play an important role in preventing coalescence, so location and size of the area being assessed are significant factors with regard to this purpose. However, the nature of the land between two towns - the role of landform and land cover in connecting or separating them visually - will affect the extent to which the closing of a physical gap between them is perceived as reducing settlement separation. The character of the settlements and their settings can be seen to be relevant here – the PAS note recommends avoidance of a 'scale rule' approach, and considers landscape character assessment to play a role in judgements – but it is important to recognise that landscape quality or value are not relevant to Green Belt purposes.
- 3.20 The NPPF specifically refers to preventing the merger of towns, not the merger of towns with smaller settlements, or the merger of small settlements with each other. However, it is recognised that the perceived gaps between towns will in turn be affected by the size of gaps associated with smaller, intervening settlements.
- 3.21 In practice Green Belt reviews often attach value to gaps involving smaller settlements, with the maintenance of the existing settlement pattern and hierarchy being considered an aim, but the wording of the NPPF does nothing to imply this.

Considerations relating to safeguarding the countryside from encroachment (purpose 3)

- 3.22 All land that retains openness can be considered to some extent to constitute countryside, but the contribution made to safeguarding the countryside from encroachment can be considered in terms of the extent to which land displays the characteristics of countryside – i.e. lack of development and land uses which are associated with countryside rather than settlement – and in its relationship with the rest of the Green Belt.
- 3.23 Urbanising influences, whether through development within the Green Belt or in an adjacent urban area, can limit the extent to which land is considered to be countryside. The extent to which an area of land relates to the wider countryside can also be considered to influence the extent of its contribution. PAS guidance suggests that "*The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open*

¹⁷ Tonbridge and Malling Borough Council Local Plan - Green Belt Study (Tonbridge and Malling Borough Council, 2016)

countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved".

- 3.24 However, it is important to avoid the inclusion of landscape quality as a factor in this assessment. It is clear from the NPPF that Green Belt is a strategic planning tool, designed to control the spread of development, and although enhancement/improvement of the Green Belt is encouraged by the NPPF (in Paragraph 81), land was not designated on the basis of landscape quality and therefore is not relevant to Green Belt purposes.

Considerations relating to preserving the setting and special character of historic towns (purpose 4)

- 3.25 Green Belt land contributing to this purpose has to have a relationship with a town that can be considered to contribute to the historic character of that settlement, and the PAS advice note considers this purpose to relate to very few settlements, due to the presence of modern development between most historic settlement cores and the surrounding countryside, but this doesn't necessarily preclude the existence of a 'natural' setting for an historic town, beyond which loss of openness would be more keenly felt. Conversely it is also the case that proximity or intervisibility alone does not mean that land contributes to this purpose: whilst many settlements have historic buildings/features these will not necessarily relate to the landscape setting of the town.
- 3.26 The wording of the NPPF suggests that this Green Belt purpose is only relevant to settlements of a certain size – i.e. towns – but the retention of openness within or around a smaller settlement may in some cases also contribute to the historic relationship between a larger settlement and its hinterland.

Considerations relating to encouraging the recycling of derelict and other urban land (purpose 5)

- 3.27 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.
- 3.28 Most Green Belt reviews do not assess land in relation to purpose 5, or consider all Green belt to contribute equally on the grounds that it is difficult to support arguments that one piece of land makes a higher contribution to encouraging re-use or urban land than another. Where local authorities have detailed information on the extent of such sites an argument could be made that Green Belt parcels around a settlement with a smaller area of unused urban land contribute more than parcels around a settlement with less 'pressure' on surrounding Green Belt, but it is very debatable as to whether development pressures operate at such a localised level. PAS guidance also suggests that the application of this purpose is unlikely to distinguish differences in contribution to Green Belt.

Beneficial use

- 3.29 The NPPF requires local planning authorities to "... 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". However such uses, whilst potentially contributing to the value of land in its open condition, are not a purpose of Green Belt and so are not relevant to the assessment of contribution.

Overall contribution, and harm resulting from release

- 3.30 It would be misleading to rate overall contribution on a scale that rigidly relies on a totalling of scores against the different Green Belt purposes – an area of land could be considered to make a strong contribution to Green Belt through achieving only one purpose but to a high degree – but it is fair to say that land which contributes to multiple purposes has the potential to be more valuable as Green Belt than land which contributes in fewer respects. In judging how much weight to place on any particular Green Belt purpose in any particular case there is precedent to suggest

that Green Belt studies should consider the reasons for a Green Belt's designation as they are related to the purposes.¹⁸

- 3.31 By considering at a sufficiently detailed scale the extent to which land possesses the essential qualities of Green Belt, and contributes to Green Belt purposes, conclusions can be drawn regarding the harm to Green Belt purposes that would result from release of Green Belt land (the presumption being that this would result in some degree of development). This study presents a strategic assessment of the Green Belt in Tunbridge Wells Borough, and so does not consider Green Belt contribution on a sufficiently localised scale to be able to draw firm conclusions regarding the harm that would result from localised release of land for development purposes.
- 3.32 Any case for release, or extension, of Green Belt land would also need to consider harm in terms of other sustainability/environmental impacts. Although beneficial use of Green Belt (as described in NPPF Paragraph 81) is not relevant to the assessment of contribution to Green Belt purposes, it may be relevant when considering harm in this wider context.
- 3.33 Alterations to a Green Belt boundary could have adverse effects in terms of sustainable development, but it is also noted that the opposite could be true, and that "*The consequences for sustainable development may require revision of the Green Belt*" (Richard Turney for the Claimant in Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J).

Green Belt Analysis

- 3.34 This assessment is a strategic one, addressing the purposes and characteristics of Green Belt at a broad scale, looking at the general pattern of development and countryside and the key landscape elements that influence it.
- 3.35 Green Belt has different purposes, but the factors that affect the contribution made by land to each purpose are not distinct to each purpose. With the exception of assistance in urban regeneration, all the Green Belt purposes can be seen to require consideration of the relationship between the assessment parcel, settlements and the countryside as influenced by the following common factors:
 - Development and land use – the extent and form of existing development, and land use characteristics, affect the degree to which a parcel can be considered to be part of the countryside rather than an extension of the urban/settled area;
 - Location – the position of the assessment parcel in relation to settlements clearly affects its role in relation to potential expansion of those settlements;
 - Separating features – landscape elements such as woodland blocks, rivers, ridges or areas of primary constraint (e.g. SSSIs) have a physical and visual impact on settlement-countryside relationships;
 - Connecting features – landscape elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.

Assessment Scope and Criteria

- 3.36 The assessment does not define specific assessment 'parcel' boundaries. It is recognised that the size of an area being assessed will potentially be a significant factor in the outcome of its assessment – for example a large block of land defined adjacent to the urban edge is likely to rate highly in terms of checking sprawl, and a block that represents all or most of the physical gap between towns will clearly play an important role in preventing coalescence – but without drawing specific boundaries it is possible, with reference to the factors listed in 3.36 above, to draw general conclusions regarding spatial variations in contribution to the different Green Belt purposes.

¹⁸ Inspector's interim findings (H Stephens) to Durham City Council (November 2014)

- 3.37 Consideration is given to land around the margins of the Tunbridge Wells Green Belt, both within the wider Metropolitan Green Belt (in Sevenoaks and in Tonbridge and Malling) and outside of it (in Tunbridge Wells Borough and Wealden District), in order to better understand the relationships between settlements and countryside and to consider variations in contribution to Green Belt. Considering how land outside of the Green Belt would contribute were it included within the designation inform decision-making in terms of potential Green Belt extensions.
- 3.38 The Stage One assessment draws on map and aerial view analysis, the Borough's Landscape Character Assessment and Conservation Area appraisals, and has also been informed by site visits.
- 3.39 Key questions to be asked in relation to openness are:
- What built development has taken place within the Green Belt?
 - What development is impending?
 - Does any existing development compromise openness?
 - Does any consented development have the potential to compromise openness?
 - Do any settlements inset within the Green Belt have sufficient openness to warrant being washed-over by the designation?
- 3.40 Key questions to be asked in relation to permanence are:
- Do any boundaries lack physical definition or likely permanence?
- 3.41 Key questions to be asked in relation to purpose 1 are:
- Which settlements constitute 'large built-up areas'?
 - Does land relate sufficiently to a large built-up area for development within it to be associated with that settlement, or would it be regarded as relating to a smaller settlement?
 - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, to be regarded more as infill than expansion?
- 3.42 Key questions to be asked in relation to purpose 2 are:
- Which settlements constitute 'towns'?
 - How much of a gap is required to avert perceived coalescence, taking into consideration the role of landscape features in creating either separation or connectivity?
- 3.43 Key questions to be asked in relation to purpose 3 are:
- Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
 - Does land relate more strongly to settlements or to the wider countryside with regard to the role of landscape features in creating either separation or connectivity?
- 3.44 Key questions to be asked in relation to purpose 4 are:
- Which settlements constitute historic towns?
 - What landscape elements/areas are important to the setting and special character of historic towns?
- 3.45 With regard to Green Belt purpose 5 - to assist in urban regeneration by encouraging the recycling of derelict and other urban land - measuring accurately the extent to which different Green Belt areas contribute to this process of recycling of derelict and other urban land is problematic:
- It is not possible to identify and measure a causal link between the policy restraint in a particular Green Belt parcel and the recycling of urban land elsewhere, in part reflecting the complexity of the development process, the locational requirements of different types of development and variations in the property market over time.
 - The scale and complexity of Greater London's urban form and Green Belt, and the relationship with neighbouring urban areas, mean that spatial analysis based on the supply

of brownfield land relative to the locations of individual Green Belt parcels would either be overly simplistic or would be based on significant assumptions such as to place the results in significant doubt.

- While brownfield land does provide one measure of the supply of land for recycling, it does not take account of regeneration initiatives based on redevelopment or re-use of existing buildings and enhancement of existing urban areas.

3.46 Answering the key questions set out above allows general judgements to be made as to where land is likely to *contribute strongly* to a Green Belt purpose, where it may make *some contribution* and where it is likely to make *no significant contribution*. Assessment Outputs

3.47 Findings are presented on a purpose-by-purpose basis, with separate consideration of openness within the Green Belt and the durability of boundaries.

3.48 Areas where land clearly makes a strong contribution to Green Belt purposes are identified and mapped as 'broad areas'.

3.49 Conclusions are drawn as to:

- Whether there are any inset settlements that should be assessed at Stage Two for potentially changing to be washed-over, or washed-over settlements that should be considered for insetting;
- Whether there are any locations within the inner Green Belt edge which should be assessed at Stage Two for possible extension of the Green Belt;
- Whether there are any locations on the outer Green Belt edge in which consideration should be given at Stage Two to extending or reducing the designated area;
- Whether there is any disparity between the Stage One findings and assessments of Green Belt in neighbouring districts.

3.50 If a detailed Stage Two assessment is to take place it should encompass all Green Belt land (together with any locations into which the designated area could potentially extend), to ensure a comprehensive study, but the size of assessment areas should reflect the outcome of the Stage One analysis. Land which clearly makes a strong contribution to Green Belt purposes need not be subdivided, other than to reflect the physical separation of distinct areas, and can be assessed at Stage Two as 'broad areas' of Green Belt. The remainder of the Green Belt, which may potentially make a weaker contribution to Green Belt purposes, should be assessed as smaller 'parcels' of land, with defined boundaries.

3.51 A map showing the proposed broad areas and parcels for a Stage Two assessment is provided.

4 Green Belt Analysis

Extent of Green Belt

- 4.1 The Metropolitan Green Belt within Tunbridge Wells Borough extends around the built up area of Royal Tunbridge Wells and Southborough. **Figure 4.1** shows the current Metropolitan Green Belt around London. **Figure 4.2** shows the Metropolitan Green Belt around Tunbridge Wells.
- 4.2 The Green Belt around Tunbridge Wells was an extension to the original Metropolitan Green Belt defined around London in the 1950s (see **Chapter 2**). It was proposed by Kent County Council to restrain development around those areas of Kent closest to London – including Royal Tunbridge Wells - in the light of the growing pressure resulting from the decentralisation of people and jobs from the urban core of London, and the ‘leap-frogging’ effect which meant that urban growth was beginning to develop beyond the Green Belt, particularly close to the main towns of the Home Counties, potentially resulting in the coalescence of towns.
- 4.3 The outer boundary of the Green Belt in Tunbridge Wells Borough was defined in the Kent Structure Plan in 1980. There is little information on the reasons for drawing the precise boundaries, but the accompanying Countryside Plan states that use was made of the administrative boundaries. The eastern extent of the Green Belt in Kent extends to the east of Tunbridge Wells and the west of Paddock Wood; the southern extent, to the south of Tunbridge Wells follows the Borough boundary.

Settlements

- 4.4 *Background Paper 1: Settlement Hierarchy* of the *Core Strategy Review* (2011) sets out the classification of the settlements in the Borough, reflecting the scale of services and facilities they provide. Settlements within or adjacent to the Green Belt are classified as follows:

Table 4.1 Settlement Hierarchy of Settlements in or adjacent to the Green Belt

Hierarchy	Settlement
Main/ Principal Urban Areas	Royal Tunbridge Wells
	Southborough
	Tonbridge (Tonbridge and Malling District)
Small Rural Towns	Paddock Wood
Villages	Bidborough
	Rusthall
	Five Oak Green
	Langton Green
	Pembury
	Speldhurst

Inner Green Belt Boundaries and Inset Settlements

- 4.5 The precise boundaries of the Metropolitan Green Belt and the ‘Limits to Built Development’ (LBD) of the settlements of Tunbridge Wells and Paddock Wood were established in *Topic Paper 5: Boundary Definition*, a background paper to the 1993 *Tunbridge Wells Borough Local Plan*. This involved determining where the character of the area changed “from being ‘built-up’ or ‘urban’

and therefore belonging to the character of the built-up area, to being 'rural', 'loose-knit' and more akin to countryside."

- 4.6 Boundaries were generally drawn close to the built-up area along the inner boundary of readily recognisable features such as roads, watercourses, hedge or tree lines. Where there were no strong identifiable features, or where, by following such a feature, large areas of mainly undeveloped land would be incorporated within the built-up area, the boundaries were drawn 10m from the rear of the principal building. The *Tunbridge Wells Borough Local Plan, 1996* reviewed and superseded the boundaries.
- 4.7 The main urban areas, small rural towns and villages listed in **Table 4.1** are thus excluded from the Green Belt and are known as 'inset settlements'.

Rural Fringe around Tunbridge Wells

- 4.8 Areas of 'Rural Fringe' around the edge of Royal Tunbridge Wells were identified to act as long-term areas of land reserve. These areas between the urban area and the Green Belt followed previous national and regional planning guidance that boundaries should not be drawn excessively tightly around existing built-up areas in order to meet longer term development needs, thus ensuring the longevity and permanence of the Green Belt boundary. Three of these Rural Fringe sites were allocated for development in the SALP:
- Speldhurst Road former Allotments (policy AL/GB 1);
 - Knights Wood (policy AL/GB 2); and
 - Land at Hawkenbury Farm (policy AL/GB 3).

Washed-over settlements within the Green Belt

- 4.9 Outside of the main urban areas, small towns and villages, the character of the landscape is predominantly rural, comprising open countryside together with a number of hamlets and isolated dwellings. Hamlets without 'Limits to Built Development' (LBD) which lie within or adjacent to the Green Belt are referred to here as 'washed-over settlements'. The washed-over settlements include:
- Villages/ hamlets west of Tunbridge Wells including Fordcombe and Penshurst (within Sevenoaks District¹⁹), and Ashurst, Stone Cross, Poundsbridge, Stockland Green, Modest Corner and Bullingstone;
 - The hamlet of Romford east of Pembury;
 - Hamlets between Tonbridge and Five Oak Green including Tudeley, Crockhurst Street and Capel; and
 - The hamlet of Whetsted between Five Oak Green and Paddock Wood.

Other development

- 4.10 There are three Major Developed Sites (MDS) within the Green Belt referenced in the Core Strategy and SALP (policy AL/GB 5) – Tunbridge Wells Hospital at Pembury, Kent College (Pembury) and Holmewood School (Langton Green).
- 4.11 There are also a number of smaller development locations within the Green Belt, notably:
- A row of houses on the A21 between Tunbridge Wells and Tonbridge;
 - A row of houses on the B2017 at Brampton Bank;
 - A row of houses on the A228 at Colts Hill Place;
 - Between Five Oak Green and Paddock Wood;
 - A hotel and nursery on the south-western edge of Pembury;

¹⁹ The Sevenoaks settlement hierarchy categorises Penshurst as a 'small village'. It had also categorised Fordcombe as a 'small village' in 2009, but a 2015 update downgraded it to a 'hamlet' to reflect a loss of local services (the closure of the village shop).

- Houses at Hungershall Park, on the western side of Tunbridge Wells.

Settlements beyond the Green Belt

- 4.12 Villages/ hamlets south of Tunbridge Wells, within Wealden District, include Groombridge²⁰, Frant and Bells Yew Green. The Wealden District settlement hierarchy, reflecting services and accessibility as well as population, categorises Groombridge and Frant as 'local service centres', and Bells Yew Green as a 'neighbourhood centre'.
- 4.13 Village to the east of Tunbridge Wells and Pembury include Matfield, the centre of which is c.1km from the Green Belt boundary, although there are houses closer, and Brenchley which lies to the east of Matfield but with little separation. The hamlet of Kippings Cross on the A21 is less than 200m from the Green Belt edge.

Evolution of settlement pattern

- 4.14 The settlement pattern apart from the main towns and villages is characteristic of the High Weald, with frequent small scale hamlets and isolated farmsteads dispersed across the landscape. The towns and villages historically occupied the areas of higher ground – with the exception of Paddock Wood and Five Oak Green, with more recent development extending into valleys – such as in the north-eastern part of Royal Tunbridge Wells. The Green Belt designation is therefore likely to have contributed to the conservation of this settlement pattern, although the High Weald AONB designation has also restricted development within the majority of the study area (see the following paragraphs for further discussion of the AONB).
- 4.15 The early 20th century saw the coalescence of Royal Tunbridge Wells with nearby villages including Southborough and Bidborough to the north, and Hawkenbury to the south-east, and Pembury with Lower Green. The latter half of the 20th century (1960's-70's) saw the merging of Langton Green and Rusthall, the expansion of Royal Tunbridge Wells, including the industrial area to the north-east of the town, and the reduction in the gap between Tunbridge Wells and Pembury to the east; as well as the expansion of Tonbridge (including the Brook Street area to the south-west), Paddock Wood and Five Oak Green.
- 4.16 The SALP has recently allocated three areas of land to the south and east of Paddock Wood (beyond the Green Belt boundary) for the provision of approximately 950 dwellings in total:
- Land at Church Farm (policy AL/PW 3A);
 - Land at Mascalls Court Road (policy AL/PW 3B); and
 - Land at Mascalls Farm (policy AL/PW 4).

Landscape Elements

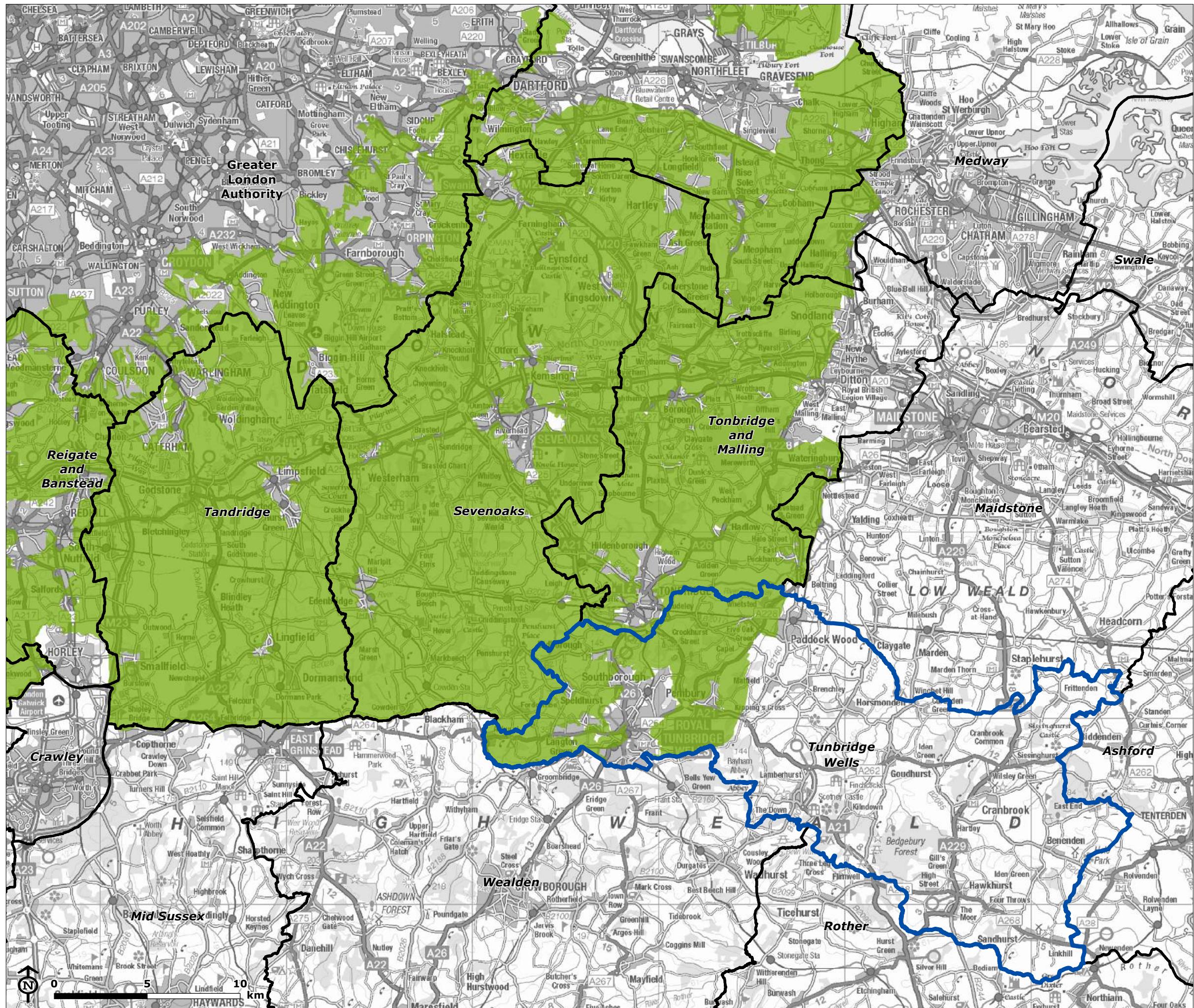
- 4.17 **Figure 4.3** shows the topography, principal roads, rivers and woodlands in the study area.
- 4.18 The Green Belt around Tunbridge Wells is characterised by the deeply ridged and incised landform of the High Weald Area of Outstanding Natural Beauty (AONB), with a distinctive ridgeline running west to east through the centre of Royal Tunbridge Wells. The countryside within the study area has a strong landscape character and its high landscape quality is reflected in its designation as AONB, which covers almost the entire area of the Green Belt. The Green Belt within the district not covered by the AONB includes the areas at the edges of the town, the area in the north east of the study area around Five Oak Green and Paddock Wood and a small area in the north of the Borough around the hamlet of Upper Hayesden.
- 4.19 Both the Green Belt designation and the AONB designation (the High Weald AONB was designated in 1983) have contributed to the conservation of the landscape and countryside character within the study area, with urbanising development generally well-contained to the distinct settlements within the LBD. The Green Belt designation in particular has restricted development around the areas of Five Oak Green and the west of Paddock Wood which lie outside of the AONB.

²⁰ The larger part of the settlement is in Wealden District but part of the older village core is in Tunbridge Wells Borough.

- 4.20 The main routes in the study area are primarily along the ridge-tops and connect settlements – e.g. the A26, A21, A264 and A267. These do not function as boundary features as usually as settlement lies to both sides.
- 4.21 Woodlands are important in creating separation and in influencing countryside character. Large woodlands have a strong separating role, in particular Broadwater Forest and Whitehill Wood to the south of Tunbridge Wells (linking to Oxpasture, Great Sandhurst and connecting woods to the south-east), and the woods to the north of Pembury.
- 4.22 Ghyll woods, particularly to the west of Tunbridge Wells, combine with landform to strengthen separation between settlements, both visually, physically and in terms of travel time along connecting lanes.

Development constraints

- 4.23 Constraints to development are a consideration when assessing Green Belt land parcels at a detailed level (i.e. a Stage Two assessment), but they can also, in performing a barrier or buffer role, influence assessment at the strategic level. The following designations are likely to provide some level of constraint to development:
- Statutory nature designations (e.g. SSSI);
 - Ancient woodlands (while there is no statutory protection for ancient woodlands they are afforded a high level of protection in the NPPF);
 - Floodplain;
 - Registered Parks and Gardens, as designated at a national level by Historic England and at a county level by Kent County Council.
- 4.24 AONB designation affects the major part of the Green Belt but is a blanket designation that does not relate to specific landscape elements. Whilst it will have a significant effect on potential future development it does not preclude it.
- 4.25 **Figure 4.4** maps the development constraints. These are separated into ‘natural’ (the first three items in the list above) and ‘cultural’ (Registered Parks and Gardens). The AONB boundary is also shown.



Tunbridge Wells Green Belt Review

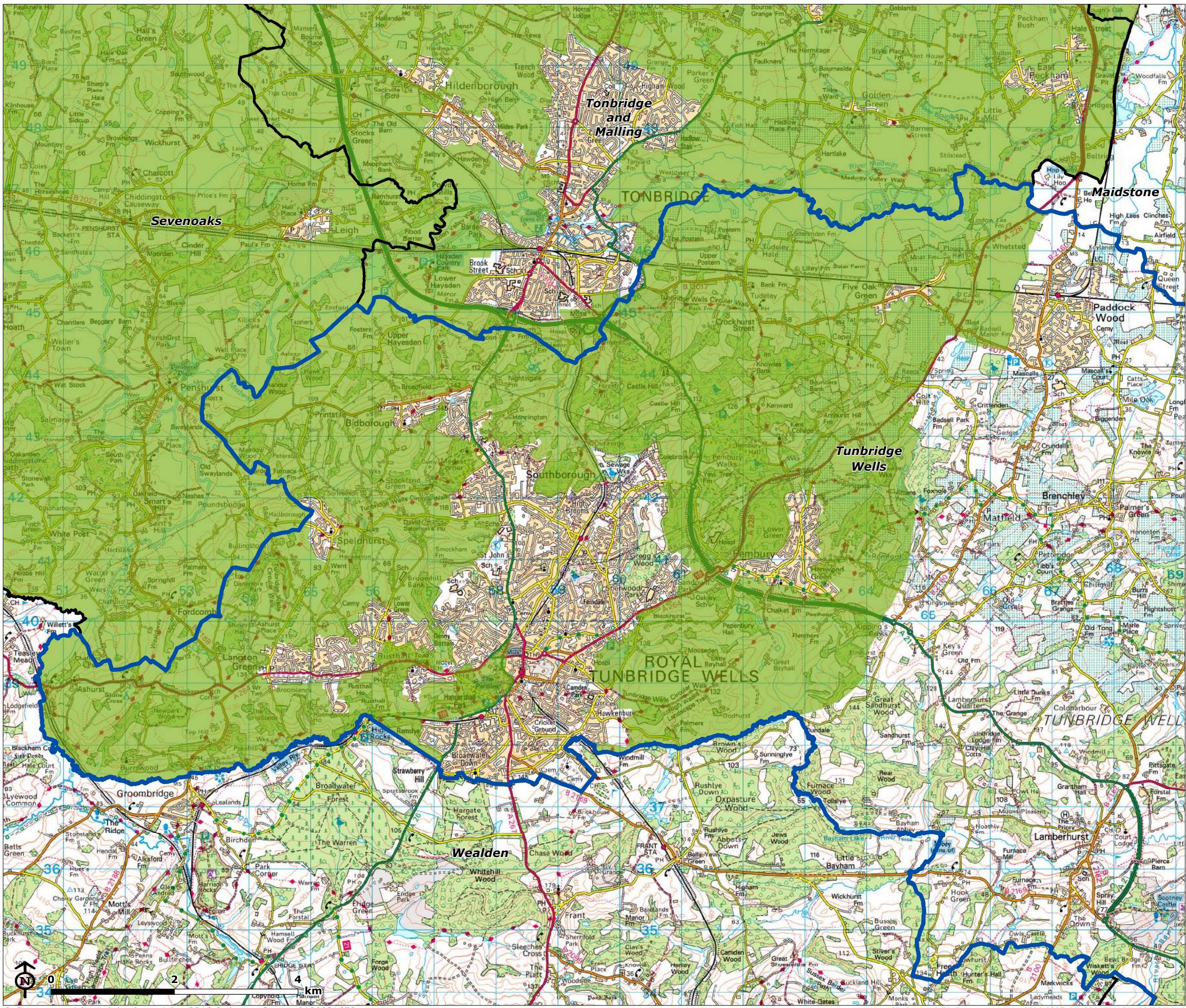
Figure 4.1: Green Belt Context

- Tunbridge Wells Borough boundary
- Admin boundary
- Green Belt

Map Scale @ A3: 1:200,000



Source: Ordnance Survey, TWBC



Tunbridge Wells Green Belt Review

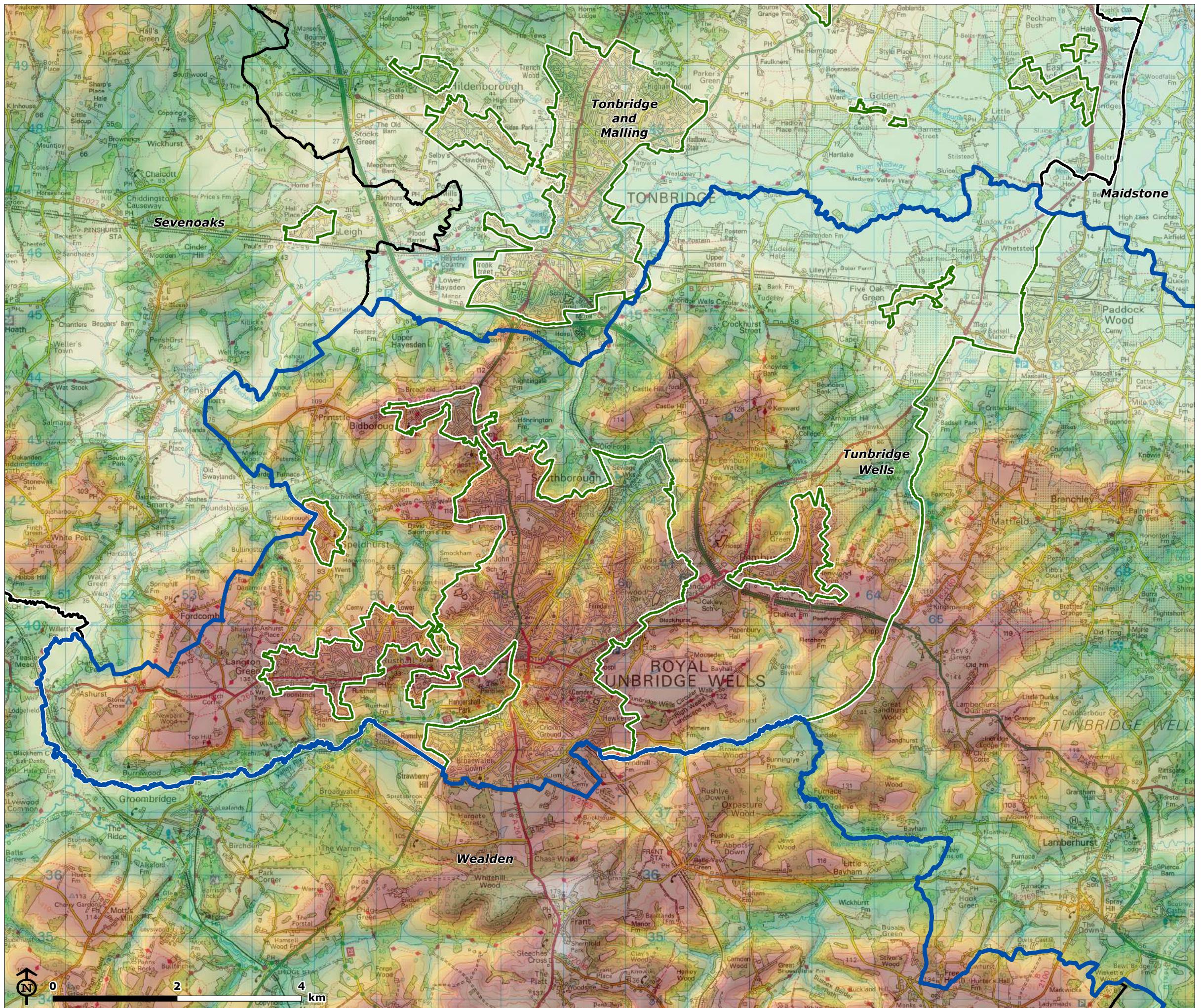
Figure 4.2: Tunbridge Wells Green Belt Context

- Tunbridge Wells Borough boundary
- District boundary
- Green Belt

Map Scale @ A3: 1:60,000



Source: Ordnance Survey, TWBC



Tunbridge Wells Green Belt Review

Figure 4.3: Topography

 Tunbridge Wells Borough boundary
 District boundary
 Green Belt

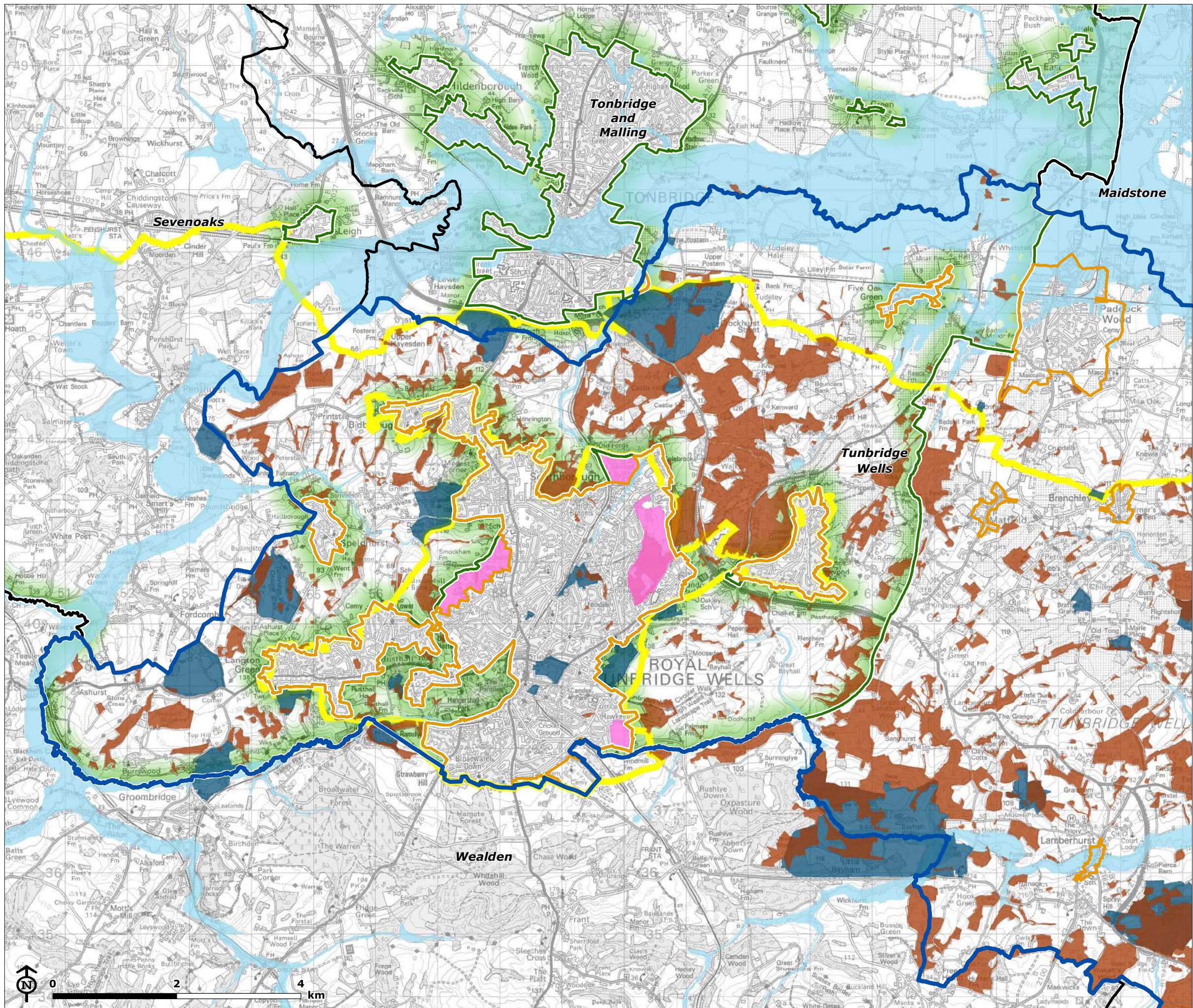
Topography

	High : 263.3
	Low : -2.4

Map Scale @ A3: 1:60,000



Source: Ordnance Survey, TWBC



Tunbridge Wells Green Belt Review

Figure 4.4: Constraints

- Tunbridge Wells Borough boundary
- District boundary
- Green Belt
- AONB
- Limits to built development
- Rural fringe
- Natural constraints
- Cultural constraints
- Floodzone

Map Scale @ A3: 1:60,000



Source: Ordnance Survey, TWBC

5 Assessment of Contribution

- 5.1 The following paragraphs consider the contribution to Green Belt purposes made by land in and around Tunbridge Wells Borough.

Openness

What built development has taken place within the Green Belt since its designation?

- 5.2 The principal built developments within the Green Belt since its designation are:
- Tunbridge Wells Hospital at Pembury - an isolated site, set in woodland. It is recognised through its MDS status as affecting Green Belt openness, but its contained setting limits its impact;
 - A Notcutts garden centre on the south-western edge of Pembury;
 - The extension of Penns Yard, Pembury (27 dwellings) - clearly an extension of the settlement into the Green Belt; the 'very special circumstances' accepted by TWBC as justifying the development were associated with its provision of affordable housing;
 - A solar farm has been developed at Hadlow Place Farm just to the west of Five Oak Green, and another, at Capel Grange to the south-east of Five Oak Green, was approved in 2015. Both were considered to represent inappropriate development in the Green Belt but also to demonstrate the 'very special circumstances' required by the NPPF to outweigh the loss of openness. Permission for solar farms is always granted for a limited period (usually 25 years) so, whilst it is accepted that they are inappropriate development in the Green Belt, their existence does not warrant removal of Green belt status. The association of this form of development with rural sites and the degree of separation that both of these sites have from the settlement of Five Oak Green means that they cannot be characterised as 'urban sprawl'.
- 5.3 The A21 improvements currently taking place are substantial works which could potentially have some impact on the Green Belt in terms of the road's role as a barrier feature, although the fact that this is already a busy road is likely to limit any such effect. Roads are not considered to affect openness as it is defined in Green Belt terms, in that they are not specifically an urban feature.

Does any pre-existing development compromise openness?

- 5.4 Of the washed-over villages and hamlets listed in Chapter 4 above, none are considered to contain any development that has a significant impact on Green Belt openness:
- Stone Cross, Poundsbridge, Modest Corner and Whetsted are all small farm or mill-centred hamlets. Capel is also a small hamlet but has a slightly detached close of modern dwellings on the site of a former isolation hospital.
 - Bullingstone, Stockland Green and Romford all have a more dispersed character in wooded settings.
 - Tudeley and Crockhurst Street, on the B2017, have a dispersed, linear character.
 - Ashurst combines a small core area, adjacent to a railway station, with a scattering of dispersed dwellings to the east.
- 5.5 The three Major Developed Sites (MDS) referenced in the Core Strategy – Tunbridge Wells Hospital at Pembury, Kent College (Pembury) and Holmewood School (Langton Green) – represent clusters of development that are large enough to compromise openness.

- 5.6 The settlements within Tunbridge Wells Borough beyond the eastern extent of the Green Belt largely retain their historic form. Matfield consists principally of linear settlement along several roads but there is a small concentration of post-1960 development on Chestnut Lane and two adjacent closes. Dispersed development links through eastward to the similarly-sized village of Brenchley. Land uses at Kippings Cross, on the A21, create some urbanising influence, but the hamlet is still a small one, with no significant expansion or infill.
- 5.7 In Sevenoaks District, Fordcombe and Penshurst have some post-1960 infill development set on short side roads off from the principal lanes, and in the case of Penshurst some nearby park home development at Hedge Barton, but neither have a significant impact on openness. Fordcombe is essentially linear in form, whilst Penshurst overall has a fairly dispersed character, with a loop of the River Medway dictating the development pattern.
- 5.8 To the south of Tunbridge Wells, in Wealden District:
- Bells Yew Green is a small village but with post-war growth, and the recent Ambermead development, adjacent to Frant Station, is a significant development (although not a greenfield one, as the site was formerly a garage).
 - Frant is a larger, nucleated village with some post-Green Belt designation infill. It is not much smaller than Speldhurst, and were the Green Belt to extend into Wealden District it is likely that it would be considered appropriate to inset Frant within it.
 - Groombridge is also a nucleated village, similar in size to Speldhurst, with significant infill in the central area since 1960. This settlement too would be likely to be inset, were the Green Belt to extend this far south.
- 5.9 With regard to the smaller development locations noted in Paragraph 4.12:
- The houses between Tunbridge Wells and Tonbridge, at Brampton Bank on the B2017 and at Colts Hill Place on the A228 are isolated rows in which most dwellings pre-date the Green Belt designation.
 - Some of the built development between Five Oak Green and Paddock Wood, to either side of the A228, is historic, but there has been residential and commercial development post-1960. The pattern of development is still open, and linear along the B2017, but it has an impact on the perception of a settlement gap between Five Oak Green and Paddock Wood.
 - The hotel & nursery at Pembury are large buildings but are set in well-treed surrounds, limiting their impact on perceived openness.
 - There is no difference in character between the row of houses at Hungershall Park and those at Nevill Park facing it across the valley, but physical separation from other development has resulted in the former being washed over by the Green Belt. Urbanising influence is limited by the strongly treed landscape surrounds.

What development is impending?

- 5.10 The three former Rural Fringe sites around Tunbridge Wells allocated for development in the SALP (see Paragraph 4.8) will deliver residential development over the coming years. These sites are now defined as lying within the LBD and so are excluded from this assessment.
- 5.11 Land at Woodsgate Corner, adjacent to Tesco at Pembury, has been allocated in the SALP (policy AL/VRA 2) for development of a park and ride scheme. There is no specific mention of park and ride in the NPPF, but the Planning Policy Guidance that preceded it considered such development to not be inappropriate as long as it did not "*seriously compromise the purposes of including land in Green Belts*"²¹

²¹ PPG2 (ODPM), paragraph 3.17.

Does any consented development have the potential to compromise openness?

- 5.12 There is no consented development that is likely to have the potential, at a strategic scale, to compromise openness in the Green Belt.
- 5.13 A planning submission for a 76-bed 'health and wellbeing' facility and 22 'extra care lodges' at Owlsnest Wood, on the south-western edge of Pembury, is awaiting determination. Development of this scale, close to the edge of the urban area, could potentially reduce Green Belt openness.

Do any settlements inset within the Green Belt have sufficient openness to warrant being washed-over by the designation?

- 5.14 Looking at the Borough's inset settlements (Tunbridge Wells, Southborough, Rusthall, Langton Green, Bidborough, Speldhurst and Five Oak Green - with Paddock Wood on the Green Belt edge) in their entirety, none have sufficient openness to warrant re-classification as 'washed-over' Green Belt.
- 5.15 There are some areas within some of these settlements that have housing of a more open character, in a form that is consistent with smaller washed-over hamlets, but their connectivity with development that is more urban in character has resulted in their exclusion from the Green Belt.
- 5.16 The only situations where this might possibly be considered are where inset development of an open character has some distinction from the rest of a settlement, and where denser/more urbanising future development in that location might represent significant sprawl, or intrusion on the countryside. Potential examples of this are the two 'tongues' of development that extend downhill south from Holmewood Ridge (Langton Green) and Nevil Park (Tunbridge Wells): Hither Chantlers and The Midway.

Boundary Permanence

Do any boundaries lack physical definition or likely permanence?

- 5.17 The physical form of Tunbridge Wells and neighbouring settlements is quite irregular in plan view, but this generally reflects the strong role of topography, and associated land cover, in constraining the pre-Green Belt evolution of settlement in the High Weald. Thus breaks in slope, sometimes with strong associated vegetation, are consistent defining features of the Green Belt's inner edge. There is no Green Belt to the south of Tunbridge Wells in Wealden District, but landform marks a consistent settlement edge.
- 5.18 There are some stretches of boundary where landform does not create a strong distinction between Green Belt and settlement, and the areas beyond these typically have more likelihood of not making a strong contribution to Green Belt purposes, and therefore would warrant more specific assessment.
- 5.19 The southern side of the outer Green Belt boundary, and the eastern side other than in the vicinity of Paddock Wood, follows no distinct landscape features. It was, according to the 1983 Kent Countryside Plan, drawn to demarcate sufficient Green Belt land to "... provide additional protection against development where such areas abut settlements and to maintain open country not subject to such policies", rather than to reflect any physical landscape features considered to mark any distinction in contribution to Green Belt purposes. It was noted that use could be made of administrative boundaries to achieve this, hence to the south it follows the County boundary, but to the east it typically seems to run close to but not precisely along parish boundaries on the eastern edge.
- 5.20 In practice, in all likelihood because of the overlap between Green Belt protection and the High Weald AONB designation, there has been no significant development in the outer vicinity of the Green Belt boundary, so Green Belt to the east of Tunbridge Wells and Pembury does not play any role in settlement separation, but it nonetheless represents a buffer that reflects the desire to constrain the eastward development of the large urban area of which they form part. A narrower

buffer zone might potentially also achieve this purpose, but the AONB designation negates this consideration. To the south there is no Green Belt buffer but again the AONB designation provides a constraint.

- 5.21 The Green Belt outer edge abuts the western side of Paddock Wood, but immediately to the south of the town there is an area of land, north of Crittenden Road and east of the A228, which is not protected by either Green Belt or AONB designation, and where the Green Belt edge in part follows a parish boundary that has no clear definition on the ground.

Are there stronger alternative boundary features?

- 5.22 The eastern Green Belt outer edge could be amended to follow nearby physical features, such as woodland edges and hedgerows, where it does not already do so, or could be adjusted more extensively to follow roads.
- 5.23 If a case was to be made for some southward expansion of Tunbridge Wells, the extensive woodlands south of the ridge marked by Broadwater Forest Lane and Bunny Lane could form a strong alternative Green Belt edge. However the current boundary, following a high ridge, is not lacking in strength, so enhancement of boundary strength would not form part of any justification for boundary change.

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

Which settlements constitute 'large built-up areas'?

- 5.24 The Green Belt in Tunbridge Wells Borough forms part of the Metropolitan Green Belt, the primary purpose of which is to control the spread of London. This is reflected in the text supporting the definition of the Green Belt in the 1983 Kent Countryside Plan (quoted in Paragraph 2.14 above). Policy MGB1 from this plan refers to the general extent of the Green Belt as being to about 15 miles from the edge of Greater London, and notes its extension to Tunbridge Wells and Paddock Wood as being exceptional.
- 5.25 The extension of the Green Belt to Tunbridge Wells reflects the significant growth of the town from the 1930's, and its resulting proximity to the similarly-sized town of Tonbridge to the north. Over this period Tunbridge Wells and the adjacent smaller settlements of Southborough, Bidborough, Rusthall, Langton Green, Hawkenbury, Pembury and Lower Green have expanded to the extent that they are, other than Green Belt gaps of c.50m between Tunbridge Wells and Rusthall and 500m between Tunbridge Wells and Pembury, a contiguous urban area. These gaps are too small for development around Rusthall, Langton Green or Pembury not to be associated with Tunbridge Wells and its connected settlement areas so, whilst they retain distinctions in terms of settlement character, these places are as a whole considered to constitute a large built-up area.
- 5.26 Tonbridge is also considered a large built-up area, being significantly larger than any other settlement in the area. Its proximity to Tunbridge Wells (see Purpose 2 discussion below) means that consideration of the effects of sprawl on its southern side are relevant to this study.
- 5.27 Paddock Wood, adjacent to the western edge of the Green Belt, is administratively a town but is significantly smaller than Tunbridge Wells and Tonbridge. The fact that the Green Belt does not surround Paddock Wood suggests that preventing its expansion was not a consideration when the Green Belt was designated, other than to limit its westward spread towards Tonbridge or Tunbridge Wells, and whilst the town has expanded since then, principally to the south-west, it is still much smaller than its neighbours to the west. It is not therefore considered in Green Belt terms to be a large built-up area.

Does any land have a strong enough relationship with the large built-up area to be regarded more as infill than expansion?

- 5.28 Expansion of Tunbridge Wells and the smaller settlements that also form part of the large built-up area has historically been focused on the ridge lines that carry the major routes in to the town, so

further outward expansion from the urban edge along these routes, such as north on the A26 from Bidborough Corner, east from Sandown Park on the A264 or west from Langton Green on the same road, would very visibly be outwards expansion of the large built-up area.

- 5.29 Topography is a significant containing element around much of Tunbridge Wells, with the industrial area in the north of the town being the only significant valley floor development other than the town centre. Expansion down from higher ground into areas that are currently open would constitute a step-change in the form of the town that would also clearly constitute outward expansion of the large built-up area. This would be the case with settlement expansion down into the broad valley of the River Medway to the north of Bidborough, southwards into the valley of Sprat's Brook or towards Frant Lakes, or into the narrow, wooded valleys that characterise the landscape both east and west of the town.
- 5.30 The only area so enclosed by urban areas that new development could potentially be considered infill is to the south of Hawkenbury between Forest Road and Benhall Mill Road (within Wealden District). There is a degree of enclosure around Tunbridge Wells Common, and to a lesser extent the valley further west between Nevill Park and Hungershall Park, but even in these areas topography, major roads and an absence of development combine to create some sense of being outside of the town.
- 5.31 Where open land occupies a similar terrain to the adjacent urban area but has some distinction from the surrounding countryside and does not coincide with significant routes out of town, development would still constitute expansion but would not constitute a step-change in settlement form. There are several locations around Tunbridge Wells that fall into this category, such as high ground to the north and east of Hawkenbury, to the east of Southborough and on the fringes of Langton Green.
- 5.32 The same factors that give land north of Bidborough and along the A26 a strong role in preventing sprawl mean that land to the south of Tonbridge plays the same role. The Green Belt and built-up area boundary coincides with the A21, so any development to the south of this would mark a clear expansion of the town.

Where would development not be considered to relate to a large built-up area?

- 5.33 For development to relate to a settlement other than Tunbridge Wells or Tonbridge it would need to be located adjacent to one of the inset settlements of Paddock Wood, Five Oak Green or Speldhurst, associated with smaller washed-over settlements that have some degree of separation from the towns, such as Ashurst or Crockhurst Street, or be a new settlement. Development on the borough fringes adjacent to Groombridge or Penshurst would be associated with those settlements rather than Tunbridge Wells.

Purpose 2: to prevent neighbouring towns merging into one another

Which settlements constitute 'towns'?

- 5.34 Tunbridge Wells, Tonbridge and Paddock Wood are towns.
- 5.35 The loss of gaps between Tunbridge Wells and adjacent settlements is cited above (Paragraph 5.29) as a reason to consider them as a whole to constitute a large built-up area. This does not mean that satellite settlement areas do not retain distinct characteristics, to which Green Belt land may make some contribution, but in most cases they are not of a size where they could realistically be considered to constitute towns.
- 5.36 Southborough is an exception to this, having its own central services, schooling and shopping facilities and being treated as a town in local planning policy. Although contiguous with Tunbridge Wells it does, to a large extent, have its own landscape setting, with valleys creating separation to the west of the A26 and to the north of High Brooms at Brokes Wood.

- 5.37 Pembury is a large village rather than a town, but is not much smaller than Paddock Wood. Although close enough to be considered to constitute part of the same large built-up area as Tunbridge Wells it retains, due to the intervening presence of the A21, physical separation from it, so the gap between the two should be considered in relation to Purpose 2.

How much of a gap is required to avert perceived coalescence, taking into consideration the role of landscape features in creating either separation or connectivity?

- 5.38 The inclusion of Tunbridge Wells in the Green Belt suggests the attachment of some importance to the preservation of a gap between it and Tonbridge. The two towns are separated by undulating north-facing slopes, cut by narrow stream valleys and characterised by numerous woodland blocks, the majority of which are ancient, but linked by the A26 which follows a ridge line across a gap of 1.4km. Roadside housing along one side of about a third of the gap, detached from both settlements, predates the Green Belt.
- 5.39 Although the A21 forms a strong edge to Tonbridge, any expansion along the A26 would reduce a fragile gap so the road corridor makes a strong contribution to settlement separation. Away from the main road, woodlands are important in maintaining separation across what would otherwise, due to elevation differences, be a largely intervisible landscape, and their retention limits the scope for any development. Land to the south of the ridge on which Beeches Wood is located, north of the east-west valley between Bidborough Corner and Moat Farm, can be considered to make a weaker contribution to this purpose, due to its visual separation and greater gap.
- 5.40 The extension of the Green Belt out to Paddock Wood suggests that importance is attached to the preservation of a gap between it and Tonbridge and also potentially Tunbridge Wells and associated settlements.
- 5.41 In terms of distance Tonbridge and Paddock Wood are over 6km apart, as the crow flies. Terrain and land cover do not create strong separation in this lower-lying, mostly arable landscape, and the inset village of Five Oak Green situated en route on the B2017 reduces the perceived openness of the gap, but the distance is still such that there is significant scope for development to the west of Five Oak Green without causing a step-change in the settlement gap. The gap between Five Oak Green and Paddock Wood represents a fairly small proportion of the overall gap between towns, but coalescence or near-coalescence of these separate settlements would have a disproportionate impact in this respect, being more likely to be perceived as sprawl.
- 5.42 Between Paddock Wood and Tunbridge Wells the wooded hills and valleys north of Pembury represent a significant physical and visual separator, and the straight-line gap is almost 6km, but the gap between Paddock Wood and Pembury is just over 4km. The A228 provides the main road link, but both towns are slightly offset from this route. The A228 corridor, on higher ground than the surrounding landscape along the southern part of the gap, makes a greater contribution to settlement separation but the gap is large enough for development adjacent to the towns not to compromise it significantly.
- 5.43 Tunbridge Wells and Southborough have already undergone a considerable degree of coalescence, but the valley landform in the vicinity of Caen Farm and Caenwood Farm constitutes a significant gap to the west of connecting development close to the A26. Likewise Brokes Wood and the valley to the east of it form a strong separation between Southborough and the industrial northern tip of Tunbridge Wells around Longfield Road.
- 5.44 Where small gaps separate inset areas that are not both considered to be towns, such as between Rusthall and Langton Green, their principal value in terms of the purposes of Green Belt is considered to relate to the extent to which they can be considered to form part of the countryside, which is assessed as Purpose 3.
- 5.45 The gap between Tunbridge Wells and Pembury is narrow, and also contributes to the larger gap between Tunbridge Wells and Paddock Wood. The A21 is a strong barrier preventing physical coalescence of the two settlements, which to an extent reduces the importance of the remaining open land between Sandown Park and the A21 as a settlement gap, but the A264 Pembury Road connects the two settlements so retention of openness in its vicinity is important.

Purpose 3: to assist in safeguarding the countryside from encroachment

Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?

- 5.46 Typically the topography and woodlands that characterise the High Weald landscape around Tunbridge Wells mean that urban landscapes are rarely a dominating feature other than from within the towns or neighbouring inset settlements.
- 5.47 Even in the few locations where narrow areas of Green Belt land are closely fringed by development on more than one side, as at Denny Bottom between Rusthall and Langton Green, the distinct landform and tree cover - a ghyll in the case of Denny Bottom – create a strong distinction from the surrounding urban areas, and a relationship with the landform that extends out into the wider countryside.
- 5.48 Farmsteads are a frequent occurrence in the Green Belt but individual clusters of dwellings such as these are not at a strategic level considered to have an urbanising influence (i.e. discounting individual dwellings which may have some urban characteristics).
- 5.49 The three Major Developed Sites (MDS) referenced in the Core Strategy – Tunbridge Wells Hospital at Pembury, Kent College (Pembury) and Holmewood School (Langton Green) – have little impact on the wider countryside:
- Tunbridge Wells Hospital at Pembury is set within woodland so its urbanising influence is limited to the immediate MDS and the passing Tonbridge Road.
 - Kent College (a girls' school) has a well treed setting which, combined with the well hedged and wooded character of much of the surrounding countryside, creates strong visual containment and restricts urbanising influence on the surrounding area. There are adjacent open fields, but the college is a mixture of modern and older buildings which does not present a strongly urbanising influence, and both the built up area and the adjacent fields benefit from an elevated setting that has a strongly rural character.
 - Holmewood House, another complex containing both modern and older buildings (a 19th century mansion), is also set on elevated ground but with strong woodland surroundings, so its influence is very localised. An estate of houses within the LBD, called Hither Chantlers, lies just to the east on similar terrain but is separated by a tree line. In this contained setting the distinction between the MDS and the housing on Hither Chantlers is limited, with only a c.100m open gap between the two, but Hither Chantlers itself represents encroachment from an urban area which otherwise stops at Holmewood Ridge to the north, so the general setting is a countryside one.
- 5.50 Other land outside the LBD and potentially subject to urbanising influence is the area occupied by Rose Hill School and the Bennett Memorial Diocesan School on the western edge of Tunbridge Wells, and the playing fields adjacent to the nearby Girls' Grammar School and Sports Centre. These areas are all designated as the Culverden Down Rural Fringe, safeguarded land for potential future development, rather than Green Belt.
- 5.51 Reflecting their open character, as noted under the Openness heading above, none of the washed-over villages or hamlets within Tunbridge Wells Borough noted in Chapter 4 is considered to represent a significant urbanising influence.
- 5.52 The main built area of Groombridge is outside of the Borough but has relationship (facing it across valley) and may potentially have some urbanising influence on surrounding countryside.
- 5.53 Of the smaller areas of built development, none represent a significant urbanising influence, but the buildings along the B2017 to the east of the inset village of Five Oak Green do reduce the perception of a gap between the village and Paddock Wood.

Does land relate more strongly to settlements or to the wider countryside with regard to the role of landscape features in creating either separation or connectivity?

- 5.54 The topography and woodlands that restrict urbanising influences around Tunbridge Wells also generally create a distinction between settlement and countryside, with the LBD commonly marking a distinct break in slope, usually down into a valley with a strong woodland component. Where such a distinction exists, land can be considered to make a strong contribution to preventing encroachment on the countryside.
- 5.55 There are however some locations where development has a stronger influence, either where it contains open land to some extent, or where there is no strong landscape element to create separation from an inset settlement but where terrain and land cover do to an extent separate that land from the wider countryside. In these instances there is some potential for land to be judged to not make a strong contribution, even though it may retain a rural character.
- 5.56 Situations where both the above circumstances apply, and land can consequently be considered to make no significant contribution to protecting countryside, are likely to be very limited, or too small in scale to be considered of strategic value, but potential cases are the land to the south of Hawkenbury between Forest Road and Benhall Mill Road (within Wealden District), and the western part of Hawkenbury Recreation Ground.
- 5.57 Examples of land that may not make a strong contribution are where there is high ground above the steeper slopes of a valley – e.g. land to the north of Southborough Common or to the west of Speldhurst – where there is containment by major roads – e.g. land north of the A264 between Tunbridge Wells and the A21 at Pembury – or where there is containment by woodland – e.g. land to the east of Hawkenbury. The Culverden Down Rural Fringe land to the west of Tunbridge Wells also has some separation from the wider countryside.
- 5.58 Land to the south of Tonbridge is separated from the urban area by the A21, and so relates more strongly to the wider countryside, and to the south-east the Registered Parkland at Somerhill forms a strong countryside buffer to the town. To the east of Tonbridge an area under fruit tree cultivation, within Tonbridge and Malling District, has a stronger relationship with the urban area but floodplain provides a buffer between this and land to the east within Tunbridge Wells District which, falling northwards towards the Medway Valley, has a strong relationship with almost uninhabited floodplain landscape.
- 5.59 Landform and land cover provide less variation in the low-lying, visually open area around Five Oak Green and Paddock Wood so, whilst land is typically well-related to the wider landscape it also strengthens the relationship between inset settlement and countryside, meaning that loss of open land is more likely to represent a gradual encroachment than a step-change in impact.
- 5.60 To the south of Paddock Wood, outside of the Green Belt, the B2017 marks the southern edge of the existing settlement, but land to the south of the road, Mascalls Farm, has been allocated for residential development in the SALP. To the east of the B2160 Maidstone Road is contained to the south by Mascalls Academy, reducing the extent to which it relates to the wider countryside. There is some distinction in terms of landform between this belt of flatter ground to the south of the B2017 and higher ground to the south of Mascalls Pound Farm and Mascalls Academy.
- 5.61 The landscape east of Paddock Wood is similar to that to the west, with no significant barriers between existing settlement and the wider countryside. Two recent SALP housing allocations take the LBD up to a watercourse, which will provide a consistent edge between the railway line and Mascall's Court, but Queens Road provides an alternative boundary to the east across this flat landscape.

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

Which settlements constitute historic towns?

- 5.62 Tunbridge Wells is recognised as a settlement which, although only developing as a town from the mid-17th century, has a special character which is significantly dependent on its landscape setting. There are many other settlements in and around the borough's Green Belt that have a longer history than Tunbridge Wells. Of these only Tonbridge, Paddock Wood and Southborough can realistically be considered to be towns.
- 5.63 The historic focus of Tonbridge is a spur of higher ground alongside which the River Medway could be crossed, a strategically important location reflected in the construction of a castle in the 11th century. The town has subsequently spread outward, but the river and its floodplain have constrained development to the east and west of the town centre and are important to its historic setting. Elsewhere the low-lying, relatively flat landscape does not provide for any distinctive setting characteristics, and in general development has stayed on lower ground, but to the south there has been some encroachment upslope, which could be seen as expansion beyond the natural river valley setting of Tonbridge into the fringes of the High Weald hills that form part of the town's setting.
- 5.64 Paddock Wood and Southborough have only developed into towns in the 20th century, the latter part of the century in the case of Paddock Wood. Paddock Wood's evolution relates primarily to the development of a rail hub serving the Weald and its surrounding landscape provides no particular setting characteristics that contribute to its form or character but, as with Tonbridge, it is a Low Weald town and any expansion southward into the High Weald would represent a distinct change in setting.
- 5.65 The strong topographical variation that characterises the High Weald has resulted in a distinctive pattern of settlement in which towns and villages are, with the particular exception of Tunbridge Wells in its original form, focused on hill tops and ridges, with only smaller hamlets and farmsteads on lower slopes and valley floors. Development that runs counter to this pattern could be considered to affect the traditional, historic form of settlements, but with regard to Green Belt purposes only Tunbridge Wells can be considered to possess a special character that is largely dependent on its relationship with landscape. Southborough, whilst not a historic town in terms of its modern evolution, does by virtue of its proximity to Tunbridge Wells form part of the latter's setting, as do the other smaller settlements that spread out along ridgelines from the fringes of Tunbridge Wells. However, the distinctions in topography that determine historic settlement form also represent a significant distinction between settlement and countryside, and therefore are an important consideration when assessing contribution to Green Belt purpose 3.

What landscape elements/areas are important to the setting and special character of historic towns?

- 5.66 Tunbridge Wells developed as a spa town from the mid-17th century, initially centred on the valley-floor Pantiles then expanding up the surrounding hillsides but leaving the Common as an open space that developed an important recreational function as the resort evolved. Tunbridge Wells Common, although it has become more wooded over the centuries, is therefore very significant to the special character of the town: the Conservation Areas Appraisal²² states that "*The juxtaposition of landscape to built development within the town is a key part of its most distinctive character*".
- 5.67 Essentially the historic core of the town is inward-looking, with the key historic areas of settlement, including the 'Arcadian' suburbs such as Calverley Park, on slopes facing the Common. The Conservation Areas Appraisal notes that "*Tunbridge Wells derives much of its character from the hills, upon and between which the town is sited*. The ridge crests mark the outer edge of the town's historic areas, and reflect the natural containment of settlement to

²² Royal Tunbridge Wells and Rusthall Conservation Areas Appraisal – TWBC (2000)

higher ground, so the openness of the undeveloped slopes beyond these areas also makes a contribution to setting and special character. This relationship between topography and development has been lost in the north-eastern part of the town, where the Ferndale and Sherwood estates suburbs, and the town's main industrial area, occupy lower ground.

- 5.68 Tunbridge Wells has evolved principally out along the ridge lines that carry the major connecting routes but, as the Urban Design Framework²³ notes, "... *the main approaches to the town are often adjacent to green spaces or tree lined, tying the town centre to its Wealden countryside*". Thus locations such as Rusthall Common and Southborough Common also contribute to historic setting.
- 5.69 Of the suburbs that were developed in the mid to late 19th century, the Pembury Road area in particular had an association with open rural views to the south-east. A number of large houses remain (some in institutional use) within this conservation area, and Dunorlan Park (a Registered Park and Garden) offers strong public views of the countryside towards High Wood and the ridge between this and Pembury.

²³ Royal Tunbridge Wells Urban Design Framework SPD (2015)

6 Conclusions and Recommendations

- 6.1 The following paragraphs summarise the findings of the spatial assessment and analysis of settlements and their surroundings, and make recommendations for the parcelling and analysis at Stage Two.

Areas Making a Strong Contribution

- 6.2 It is clear from the planning policies referenced in Chapter 2 that the expansion of Tunbridge Wells and maintaining the separate identity of neighbouring settlements were key considerations in the drawing up of Green Belt boundaries.
- 6.3 Those parts of the borough and adjacent districts defined as 'broad areas' on the maps in Figures 6.1A-F, and listed in Table 6.1, are considered to clearly make a strong contribution to one or more Green Belt purposes. These include land within neighbouring districts that is closely associated with Tunbridge Wells Borough.
- 6.4 In all cases these areas represent countryside that is distinct from urban development, in which development would represent encroachment (i.e. Purpose 3). Topography and land use, in particular tree cover, are key factors in limiting the influence of urban areas. A number of these broad areas, or parts of them, are additionally considered likely to make a strong contribution to other Green Belt purposes:
- Locations adjacent to the edges of Tunbridge Wells in BA6, BA7, BA8 and BA10, and adjacent to both Tunbridge Wells and Tonbridge in BA1 and BA2 contribute strongly to preventing the sprawl of a large built-up area (Purpose 1);
 - The area north of the settlements that form the Tunbridge Wells large built-up area and south of Tonbridge (BA1 and BA2) plays an important role in preventing the coalescence of towns (Purpose 2);
 - BA8, encompassing Tunbridge Wells Common and land to the west of it, and BA6, to the south-east of Pembury Road, make a strong contribution to preserving the special character of the town (Purpose 4).

Table 6.1: Potential Stage Two broad areas

Settlement/area	Parcel/ broad area	Strong contribution to Green Belt Purposes			
		Purpose 1	Purpose 2	Purpose 3	Purpose 4
South west of Tonbridge	BA1	✓	✓	✓	
South east of Tonbridge	BA2	✓	✓	✓	
Between Tonbridge and Paddock Wood – south of railway	BA3			✓	
Between Tonbridge and Paddock Wood – north of railway	BA4			✓	
Between Paddock Wood and Pembury	BA5			✓	
Between Pembury and Hawkenbury	BA6	✓		✓	✓
South of Tunbridge Wells	BA7	✓		✓	

Settlement/area	Parcel/ broad area	Strong contribution to Green Belt Purposes			
		Purpose 1	Purpose 2	Purpose 3	Purpose 4
Spa Valley	BA8	✓		✓	✓
South west of Langton Green	BA9			✓	
West of Tunbridge Wells	BA10	✓		✓	

Changes to Inset/Washed-Over Status

- 6.5 With regard to the status of existing development within Tunbridge Wells Borough, there is unlikely to be justification for the 'exceptional circumstances' required to alter Green Belt boundaries.

Changes to Outer Boundary

- 6.6 The NPPF identifies (at Paragraph 85) a need for new Green Belt boundaries to follow "*readily recognisable*" physical features, but also requires the demonstration of "*exceptional circumstances*" to justify alterations. In the absence of any evidence of significant development pressures along the eastern outer Green Belt edge there is unlikely to be any need to redefine the boundary to follow strong physical features; however many local planning authorities have made small-scale alterations to specific sections of Green Belt boundary to better reflect physical landscape features and a case could potentially be made to do this in Tunbridge Wells Borough.
- 6.7 With regard to the AONB there is precedent in the case of the New Forest National Park for removal of Green Belt designation where there was felt to be adequate protection against urbanising development through other designation (i.e. the creation of National Park status), although this step was not considered prior to that when the Forest formed part of the South Hampshire Coast AONB. The overlap of designations could be considered least warranted in locations where Green Belt only makes a strong contribution in terms of Purpose 3 (encroachment on countryside), but as the removal of the designation would be unlikely to facilitate any strategic development in these circumstances there are unlikely to be any exceptional circumstances to justify alterations.
- 6.8 In the vicinity of Paddock Wood, where in the absence of Green Belt and AONB designation there has been greater development pressure, there is potentially a stronger case to consider creating an outer boundary that follows physical landscape features.
- 6.9 If a more detailed assessment of land parcels is to take place it could include land to the south and east of Paddock Wood, to establish whether there would be any significant variations in terms of Green Belt contribution were the designated area to be extended. However, in the absence of any sizeable settlements to the east or south of Paddock Wood, and any historic setting/special character considerations, the land here would be likely to contribute principally to preventing countryside encroachment (Purpose 3). This alone would not be justification for extending the Green Belt, unless the potential growth of Paddock Wood beyond a certain size would be a concern justifying the imposition of a Green Belt buffer (in the same way that there is a buffer to the east of Tunbridge Wells and Pembury), and the implications – positive or negative – that this might have for sustainable development.

Changes to Inner Boundary

- 6.10 Where there is some potential for areas of land not to make a strong contribution to Green Belt purposes, parcels are proposed for further assessment.

Green Belt in Neighbouring Districts

- 6.11 It is suggested that land in Wealden District immediately to the south of Tunbridge Wells should, in light of potential development pressures from the large built-up area, be included in any further assessment, to understand how it would contribute to Green Belt purposes were it included within the designated area. Strong containment by woodland to the south marks an obvious outer edge for this area.
- 6.12 The 'broad areas' identified on the western and northern sides of the Borough have been defined using strong outer boundary features, namely the River Medway and the A21, which means that they extend in places into the neighbouring Sevenoaks District and Tonbridge and Malling Borough.

Potential next steps

Stage Two assessment

- 6.13 33 parcels and 10 broad areas have been suggested for assessment at Stage Two, should this be required, using boundary features which are considered to potentially reflect a change in relationship between settlement and countryside. Where possible strong, defensible features have been used.
- 6.14 **Figures 6.1A-F** illustrate the defined broad areas and parcels, which are also listed in **Table 6.2**.
- 6.15 The parcels represent the areas in which there is a possibility that land may not be found to make a strong contribution to Green belt purposes.
- 6.16 Although the existence of Rural Fringe designation (i.e. safeguarded land) was not a consideration in this assessment, all of the designated Rural Fringe sites do fall within proposed Stage Two parcels.
- 6.17 Two parcels, TW6 and TW7, include land within Wealden District that abuts Tunbridge Wells. As noted in 6.9 above, land beyond the Green Belt edge around Paddock Wood could also be included in the parcelling.

Further assessment

- 6.18 In making judgements on relative contribution to Green Belt purposes, no consideration is given to the potential effects of development beyond the five stated purposes, but when reviewing boundaries, local authorities are required to "... consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary" (NPPF Paragraph 84). This judgement will require an analysis of factors such as highway capacity, location of amenities and services, and effects on landscape and ecological resources, with all of these factors considered against the need-case for development, so a review of Green Belt contribution is only one aspect of the review process.

Table 6.2: Potential Stage Two parcels and broad areas

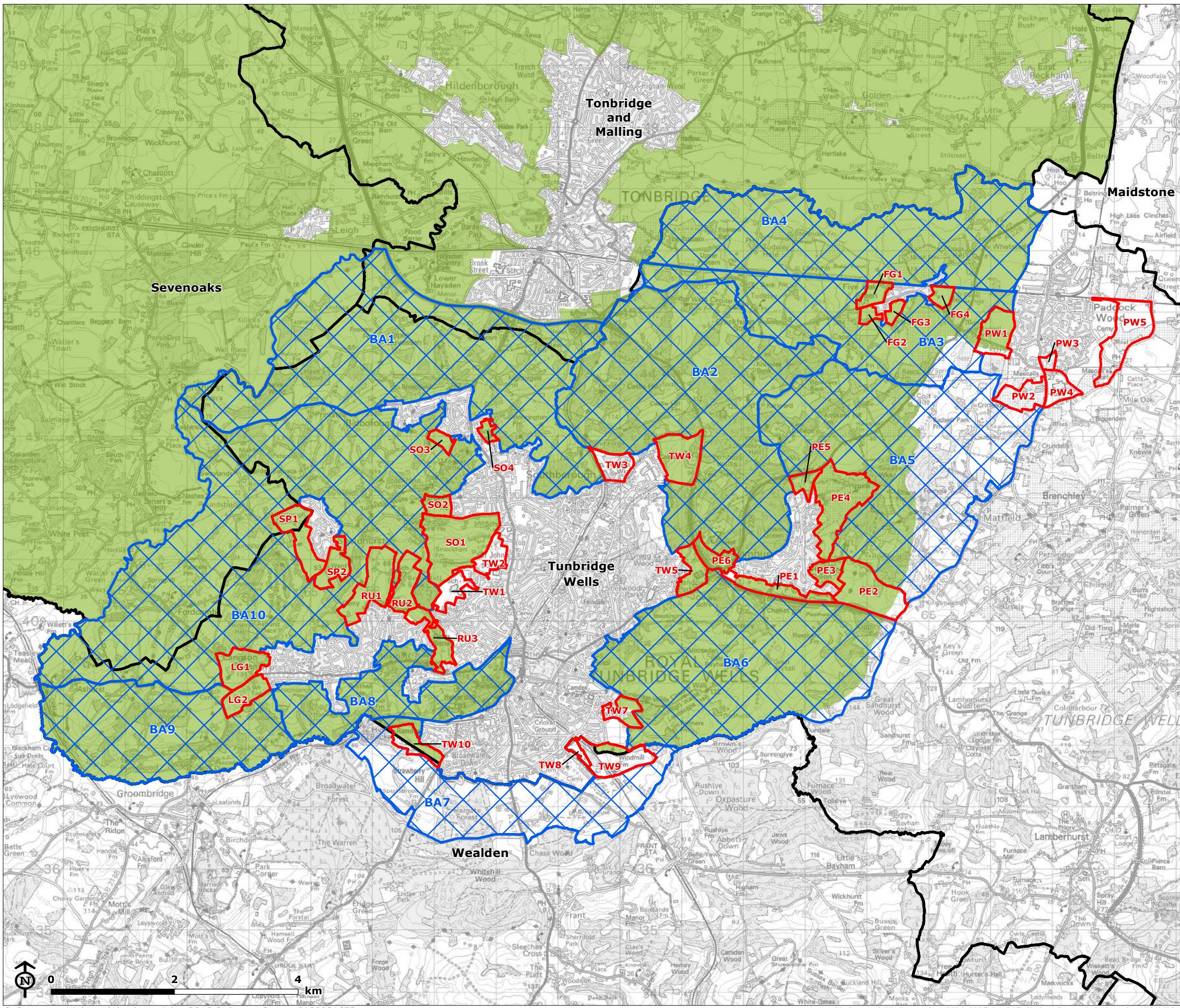
Settlement/area	Parcel/ broad area	Key Stage Two considerations
South west of Tonbridge	BA1	Contribution to preventing countryside encroachment, and as gap between Tonbridge and Tunbridge Wells
South east of Tonbridge	BA2	Contribution to preventing countryside encroachment, and as gap between Tonbridge and Tunbridge Wells; extent of woodland constraint
Between Tonbridge and Paddock Wood – south of railway	BA3	Contribution to gap between Tonbridge and Paddock Wood; extent of openness; distinction between Low and High Weald landscapes
Between Tonbridge and Paddock Wood – north of railway	BA4	Contribution to preventing countryside encroachment; floodplain constraint and extent of openness
Between Paddock Wood and Pembury	BA5	Contribution to preventing countryside encroachment and as gap between Paddock Wood and Pembury
Between Pembury and Hawkenbury	BA6	Contribution to preventing countryside encroachment and role in historic setting of Tunbridge Wells
South of Tunbridge Wells	BA7	Contribution to preventing countryside encroachment and role of woodland in limiting potential urban sprawl
Spa Valley	BA8	Contribution to preventing countryside encroachment and role in historic setting of Tunbridge Wells
South west of Langton Green	BA9	Contribution to preventing countryside encroachment
West of Tunbridge Wells	BA10	Contribution to preventing countryside encroachment
Southborough	SO1	Relationship between settlement and countryside, role in preventing sprawl of large built-up area and role in separation between Tunbridge Wells and Southborough
	SO2	Relationship between settlement and countryside and role in preventing sprawl of large built-up area
	SO3	Relationship between settlement and countryside role in preventing sprawl of large built-up area
	SO4	Relationship between settlement and countryside, with reference to extent of containment by woodland
Five Oak Green	FG1	Relationship between settlement and countryside and role in settlement gap between Tonbridge and Paddock Wood
	FG2	Relationship between settlement and countryside and role in settlement gap between Tonbridge and Paddock Wood
	FG3	Relationship between settlement and countryside and role in settlement gap between Tonbridge and Paddock Wood
	FG4	Relationship between settlement and countryside and role in settlement gap between Tonbridge and Paddock Wood
Paddock Wood	PW1	Relationship between settlement and countryside and role in settlement gap between Tonbridge and Paddock Wood; floodplain constraint
	PW2	Relationship between settlement and countryside and connectivity with existing Green Belt (parcel is outside of Green Belt)
	PW3	Relationship between settlement and countryside, considering extent of containment by built development, and connectivity with existing Green Belt (parcel is within LBD)
	PW4	Relationship between settlement and countryside and connectivity with existing Green Belt (parcel is outside of Green Belt)

Settlement/area	Parcel/ broad area	Key Stage Two considerations
Pembury	PW5	Relationship between settlement and countryside and connectivity with existing Green Belt (parcel is outside of Green Belt)
	PE1	Relationship between settlement and countryside, with reference to role of A21 in forming barrier to encroachment/sprawl
	PE2	Relationship between settlement and countryside and role in preventing sprawl of large built-up area
	PE3	Relationship between settlement and countryside, with reference to extent of containment by settlement and woodland
	PE4	Relationship between settlement and countryside and role in preventing sprawl of large built-up area, with reference to barrier role of ancient woodlands
Tunbridge Wells	PE5	Relationship between settlement and countryside, with reference to role of A264 in forming barrier to encroachment/sprawl
	PE6	Relationship between settlement and countryside, and gap between Pembury and Tunbridge Wells, with reference to relationship with existing urban area and role of A21 in forming barrier to encroachment/sprawl
	TW1	Relationship between settlement and countryside, role in preventing sprawl of large built-up area and role in separation between Tunbridge Wells and Southborough (parcel is safeguarded Rural Fringe land)
	TW2	Relationship between settlement and countryside, role in preventing sprawl of large built-up area and role in separation between Tunbridge Wells and Southborough (parcel is safeguarded Rural Fringe land)
	TW3	Relationship between settlement and countryside (parcel is safeguarded Rural Fringe land)
	TW4	Relationship between settlement and countryside, with reference to barrier role of A21
	TW5	Relationship between settlement and countryside and role in gap between Tunbridge Wells and Pembury, with reference to barrier role of A21
	TW6	Relationship between settlement and countryside, with reference to role of High Wood in forming barrier to encroachment/sprawl
	TW7	Relationship between settlement and countryside, with reference to extent of containment by settlement, railway and woodland (land is allocated for development by Wealden District)
	TW8	Relationship between settlement and countryside (most of the parcel is in Wealden District)
Rusthall	TW9	Relationship between settlement and countryside, and potential role in historic setting of Tunbridge Wells (part of the parcel is in Wealden District)
	RU1	Relationship between settlement and countryside and role in gap between Rusthall, Speldhurst and Tunbridge Wells
	RU2	Relationship between settlement and countryside and role in gap between Rusthall, Speldhurst and Tunbridge Wells
	RU3	Relationship between settlement and countryside, role in gap between Rusthall and Tunbridge Wells and

Settlement/area	Parcel/ broad area	Key Stage Two considerations
		contribution to historic setting of the latter
Langton Green	LG1	Relationship between settlement and countryside and role in preventing sprawl of large built-up area
	LG2	Relationship between settlement and countryside and role in preventing sprawl of large built-up area
Speldhurst	SP1	Relationship between settlement and countryside, with reference to impact of development on west side of hill and gap to Bullingstone
	SP2	Relationship between settlement and countryside; role of wooded ghyll in forming barrier to encroachment/sprawl

Tunbridge Wells Green Belt Review

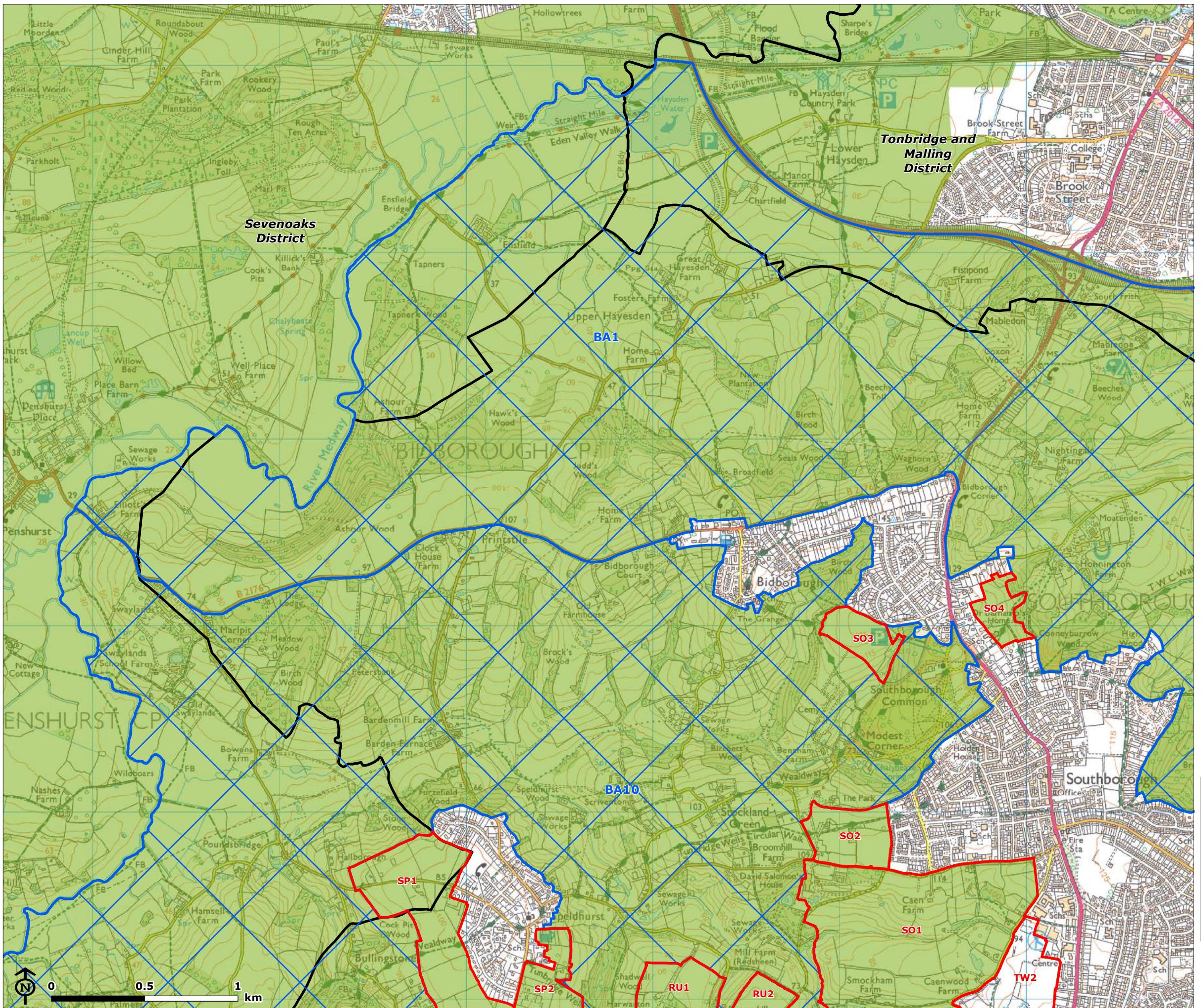
Figure 6.1: Green Belt Parcels

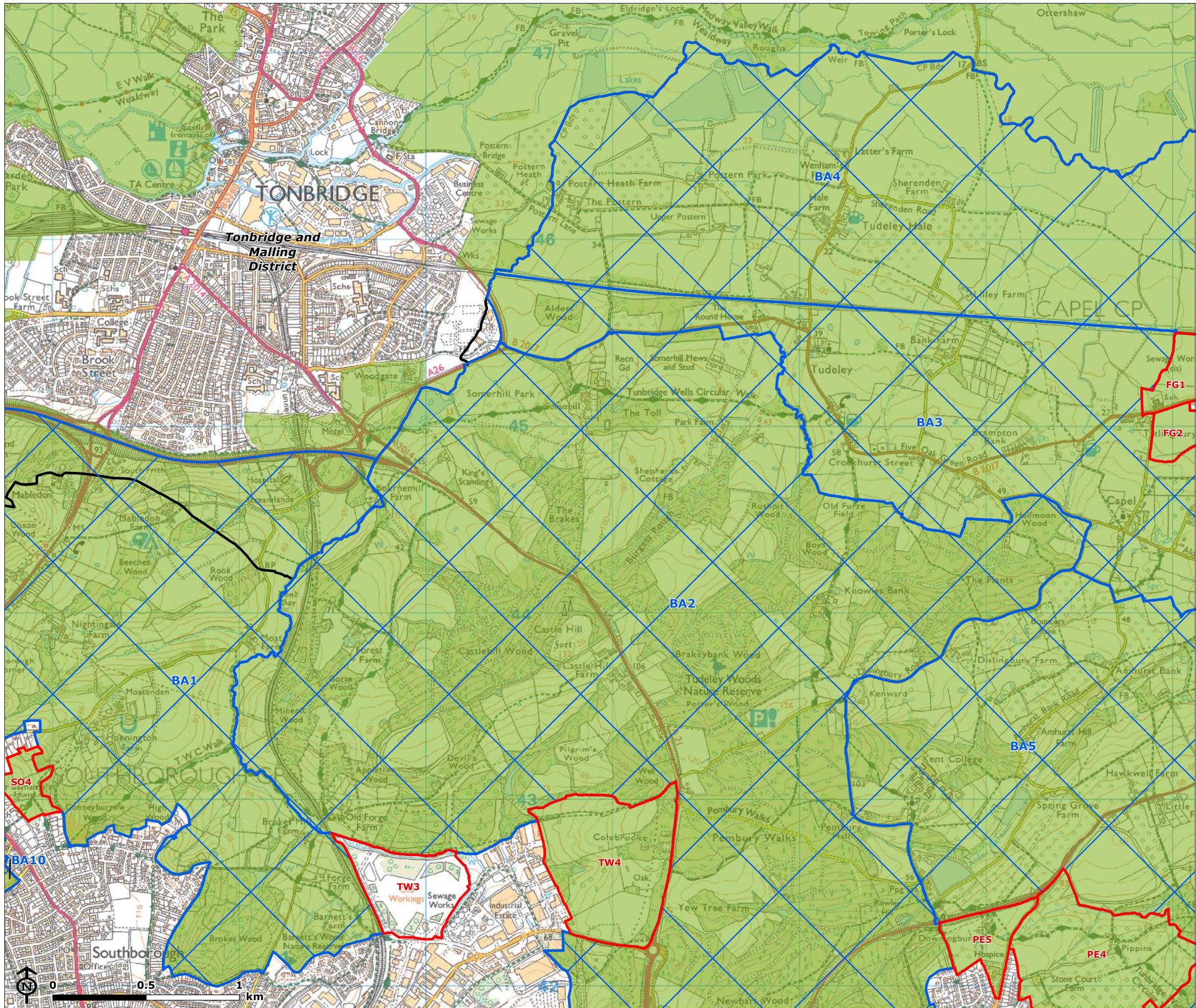


Map Scale @ A3: 1:60,000



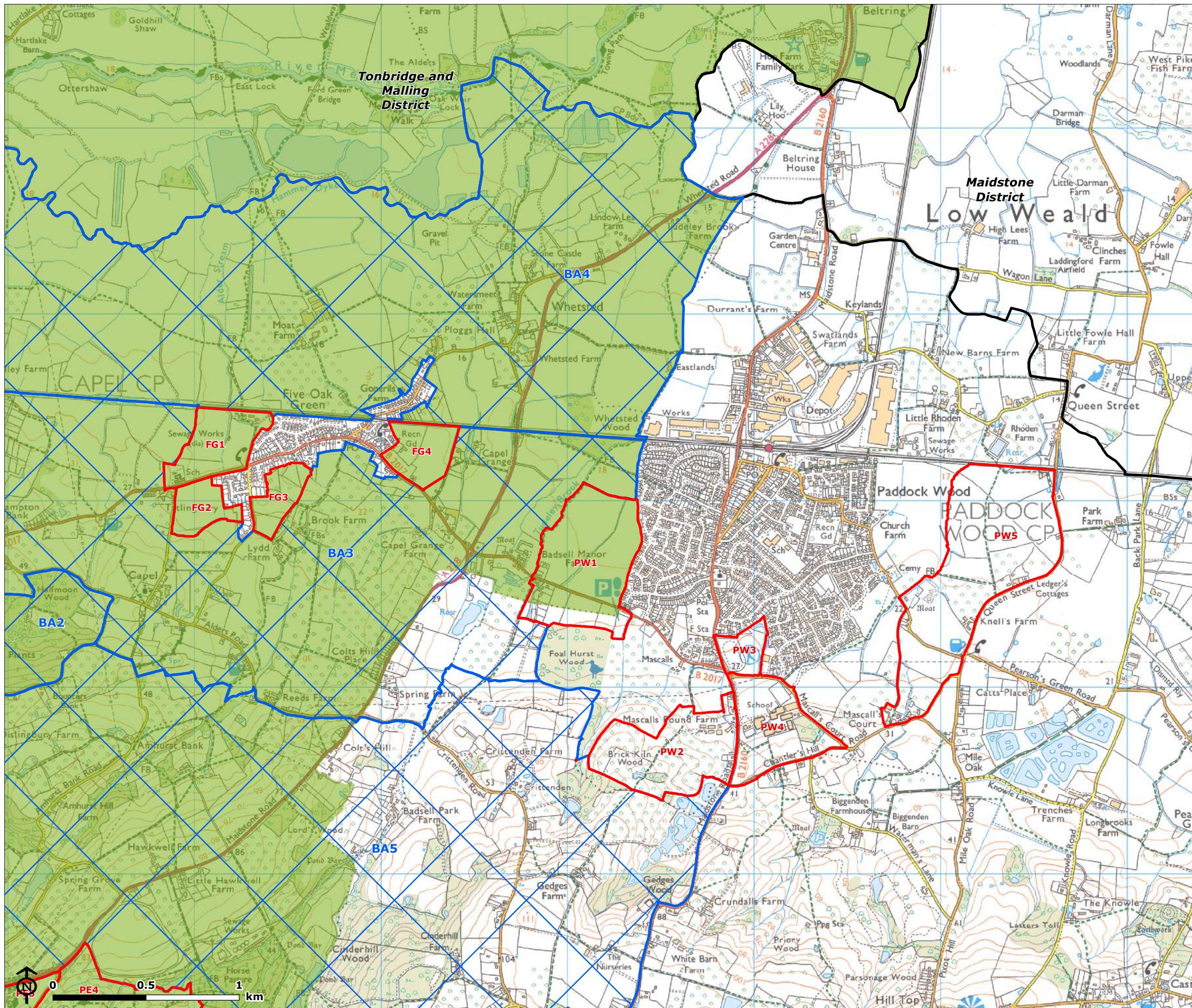
Source: Ordnance Survey, TWBC



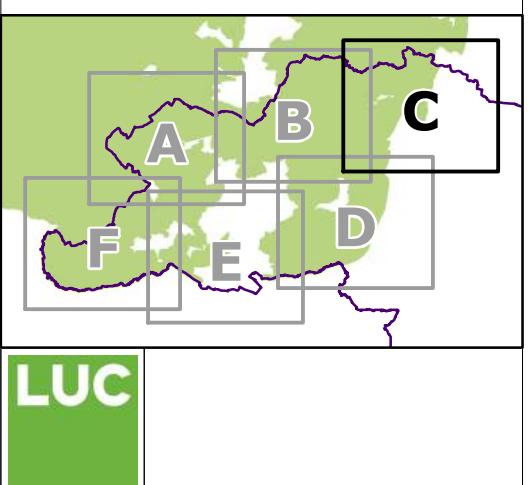


Tunbridge Wells Green Belt Review

Figure 6.1: Green Belt Parcels Grid C



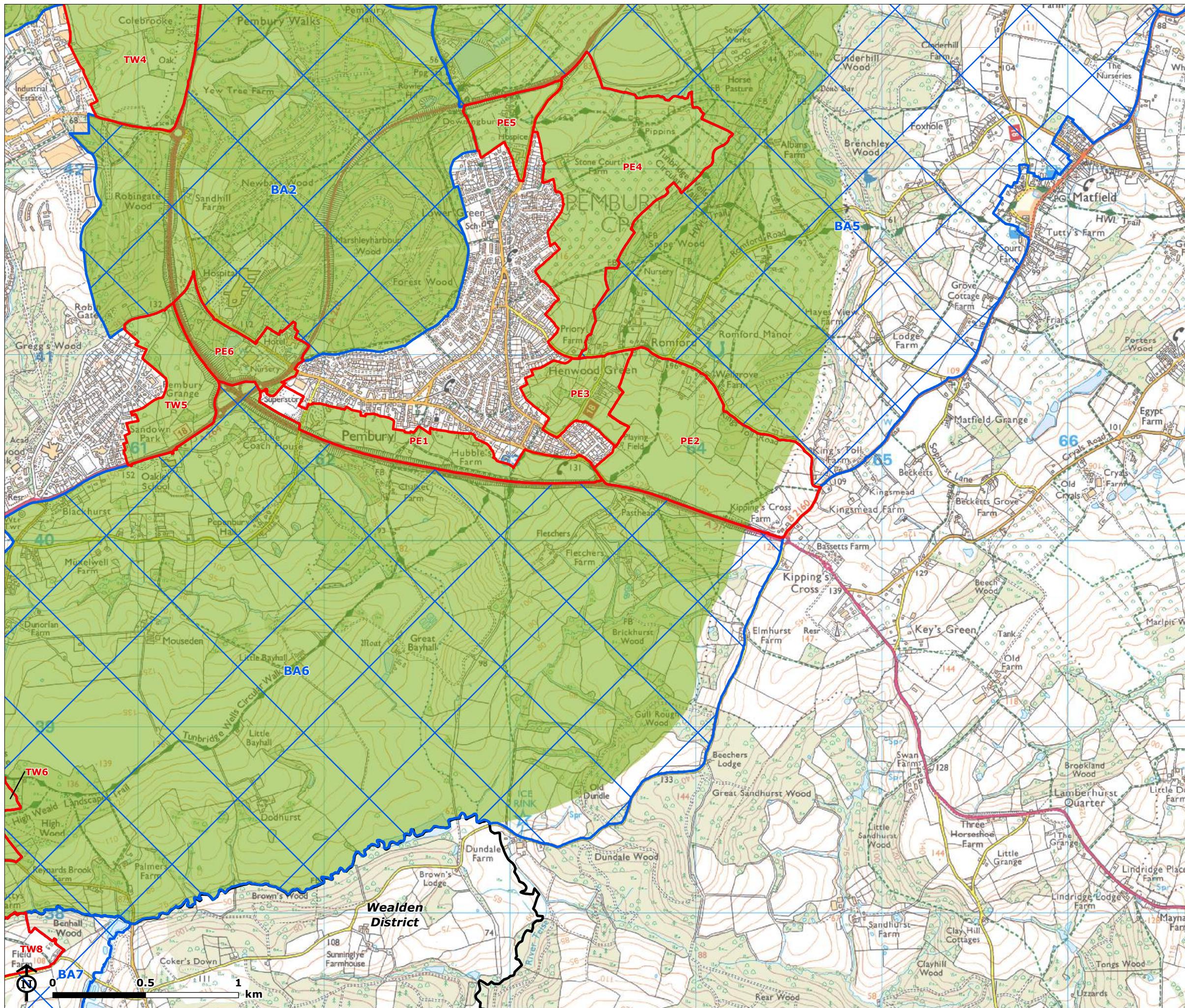
Map Scale @ A3: 1:20,000



Tunbridge Wells Green Belt Review

Figure 6.1: Green Belt Parcels Grid D

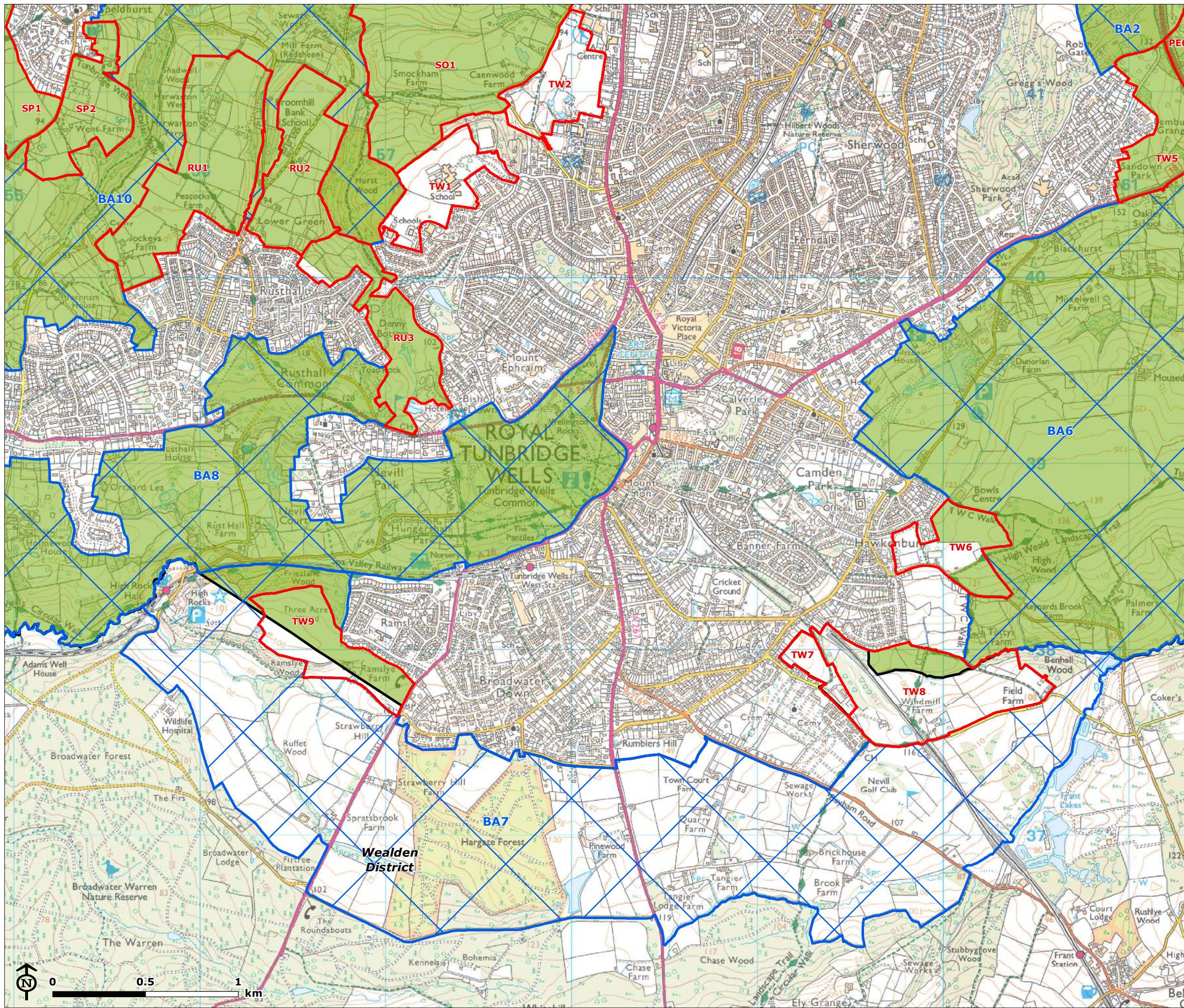
- [Black square] District boundary
- [Light green square] Green Belt
- [Red square] Green Belt parcel
- [Blue square] Broad area



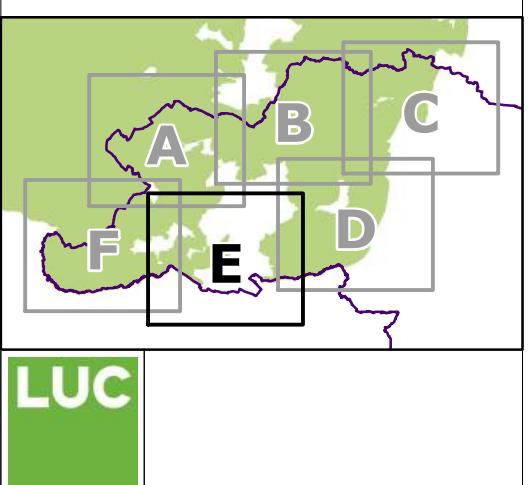
Tunbridge Wells Green Belt Review

Figure 6.1: Green Belt Parcels Grid E

- [Black box] District boundary
- [Light green box] Green Belt
- [Red box] Green Belt parcel
- [Blue box] Broad area



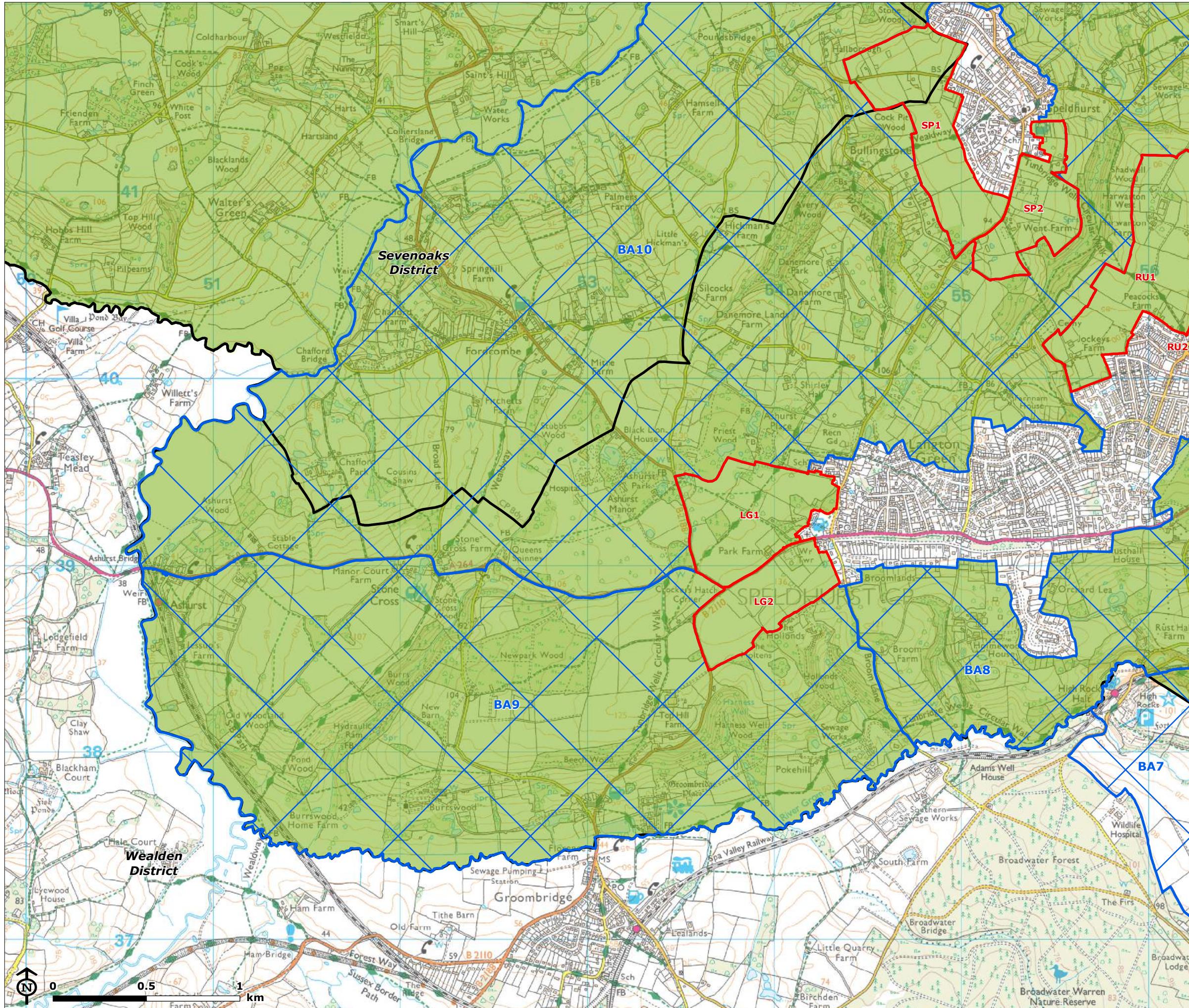
Map Scale @ A3: 1:20,000



Tunbridge Wells Green Belt Review

Figure 6.1: Green Belt Parcels Grid F

- [Black box] District boundary
- [Light green box] Green Belt
- [Red box] Green Belt parcel
- [Blue box] Broad area



Map Scale @ A3: 1:20,000

