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Tunbridge Wells Green Belt Study

Stage Two

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Tunbridge Wells Green Belt Study

Stage Two

Final Report

Prepared by LUC
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1 Executive Summary

- 1.1 This report presents the findings of an assessment of the contribution to Green Belt purposes made by land within the Green Belt in Tunbridge Wells Borough. It also employs the same assessment criteria to consider how certain areas of land adjacent to the Green Belt would contribute, were they to be designated.
- 1.2 The report represents Stage Two of a two-part study. The first part, the Tunbridge Wells Borough Green Belt Strategic Study (LUC, November 2016), informed this Stage Two assessment by:
- Identifying key assessment considerations;
 - Identifying those parts of the borough and adjacent districts which were considered to clearly make a strong contribution to one or more Green Belt purpose, and dividing them into *broad areas* of Green Belt to reflect significant variations in their relationship with settlements;
 - Subdividing those areas potentially *not* making a strong Green Belt contribution into smaller assessment *parcels*, reflecting variations in the relationship between settlement and countryside.
 - The Stage Two study assessed 37 parcels and 10 broad areas identified in the Strategic Study, using a consistent approach of rating contribution to each of the five Green Belt purposes identified in the National Planning Policy Framework (NPPF), so as to provide a comprehensive assessment of the Green Belt within the Borough. Paragraph 80 of the NPPF identifies the purposes of Green Belt:
 - Purpose 1: Check the unrestricted sprawl of large built-up areas;
 - Purpose 2: Prevent neighbouring towns from merging;
 - Purpose 3: Assist in safeguarding the countryside from encroachment;
 - Purpose 4: Preserve the setting and special character of historic towns; and
 - Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 1.3 The assessment process involved a combination of desktop analysis and fieldwork, rating contribution to each purpose on a 5-point scale from *high* to *low*. Some of the parcels were further subdivided as part of the assessment process, where significant variations were identified during the analysis stage, so 45 parcel and 10 broad area assessments were produced in total.
- 1.4 An overall rating was given to each broad area and parcel to indicate the level of *harm* that could be caused to the Green Belt were the area in question to be released. This rating reflected the highest contribution to any of the first four Green Belt purposes (all land was considered to make an equal contribution to the fifth Green Belt purpose):

Stage Two assessment of parcels	Level of harm caused by release of parcel
Makes a STRONG contribution to one or more GB purposes.	Very high
Makes a RELATIVELY STRONG contribution to one or more GB purposes. No strong contribution to any purpose.	High
Makes a MODERATE contribution to one or more GB purposes. No strong or relatively strong contribution to any purpose.	Moderate
Makes a RELATIVELY WEAK contribution to one or more GB purposes. No strong, relatively strong or moderate contribution to any purpose.	Low
Makes a WEAK/NO contribution to one or more GB purposes. No strong, relatively strong, moderate or relatively weak contribution to any purpose.	Very low

- 1.5 For those parcels that are not in the Green Belt the question of harm resulting from release is not relevant, but the harm rating can still be taken as an indicator of the role of the land in question in terms of the relationship between settlement and countryside.
- 1.6 All 10 broad areas were considered to rate *very high* for harm to Green Belt resulting from release of land for strategic development. It should however that there might be opportunities for small-scale – i.e. non-strategic – development that would result in less harm to Green Belt purposes. **Figure 1.1** below illustrates the locations of these broad areas of Green Belt.
- 1.7 Harm associated with the release of parcels is summarised in **Figures 1.2** and **1.3** below. **Figure 1.2** illustrates the ratings for each defined parcel within the Green Belt, and **Figure 1.3** illustrates parcels where one or both of the following apply:
- Where the parcel is wholly or mostly outside of the Green Belt, either beyond the outer edge or within the inner boundary;
 - Where all or part of the parcel lies beyond the Green Belt in a district that does not have any designated Green Belt.
- 1.8 **Table 1.1** lists those parcels where harm rating was found to be *moderate* or lower.

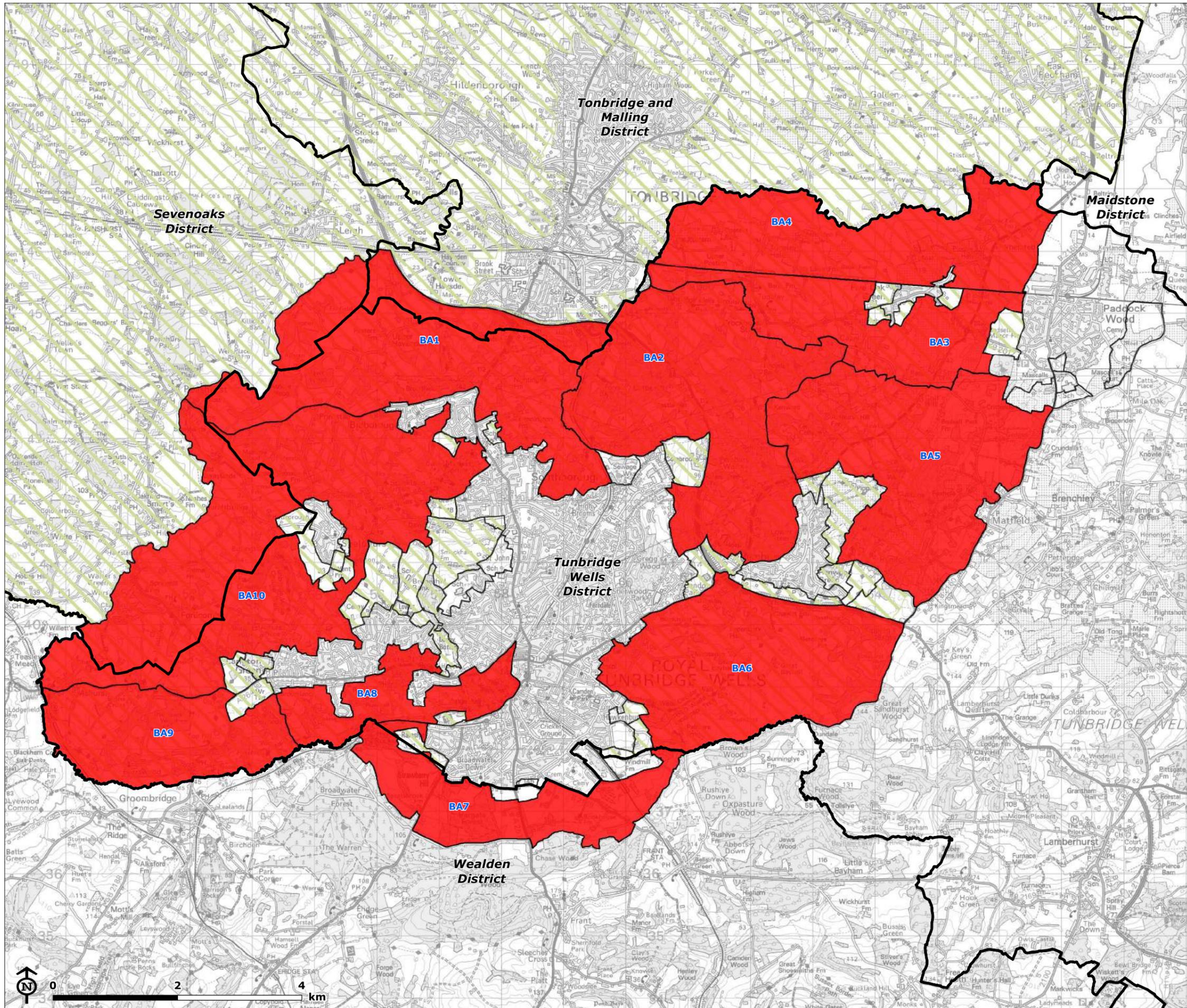
Table 1.1 Parcels with *moderate* or lower harm rating

Parcel	Settlement	Area (ha)	Harm rating
FG1	Five Oak Green	14.5	Moderate
FG3	Five Oak Green	7.2	Moderate
FG4	Five Oak Green	10.1	Moderate
PE2a	Pembury	24.3	Moderate
PE5	Pembury	12.2	Moderate
PE6	Pembury	19.2	Moderate
PW1	Paddock Wood ¹	35.3	Moderate
RU1a	Rusthall	16	Moderate
RU2a	Rusthall	4.1	Moderate
SO1a	Southborough	5.4	Moderate
SO2	Southborough	13.4	Moderate
SO3	Southborough	8.6	Moderate
SP2a	Speldhurst	5.5	Moderate
SP2b	Speldhurst	19.1	Moderate
TW3	Tunbridge Wells	23.1	Moderate
TW4	Tunbridge Wells	48	Moderate
TW6a	Tunbridge Wells	14.7	Moderate
TW7	Tunbridge Wells	32.4	Moderate
TW11	Tunbridge Wells	9.3	Moderate
PE1	Pembury	30.5	Low
PW4a	Paddock Wood	10.2	Low
SO4	Southborough	6.9	Low
TW1	Tunbridge Wells	29.5	Low
TW2	Tunbridge Wells	19.5	Low
TW8	Tunbridge Wells	19.3	Low
PW3	Paddock Wood	5.6	Very low

¹ Although adjacent to Paddock Wood most of the parcel PW1 lies within Capel Parish

- 1.9 The results of analysis of Green Belt contribution can be compared to assessments of environmental land value (including landscape, views, cultural heritage and biodiversity) and sustainability of potential development, to determine a range of potential development scenarios.
- 1.10 It is suggested that these scenarios can be assessed in terms of potential harm resulting from release of Green Belt. High-level mitigation ideas, considering potential to offset either Green Belt harm, environmental harm or sustainability concerns, could be considered for each scenario, as a basis for final decisions regarding the proposed development strategy and any subsequent masterplan briefs.

Figure 1.1: Potential Level of Harm to the Green Belt Associated with Release of Broad Areas



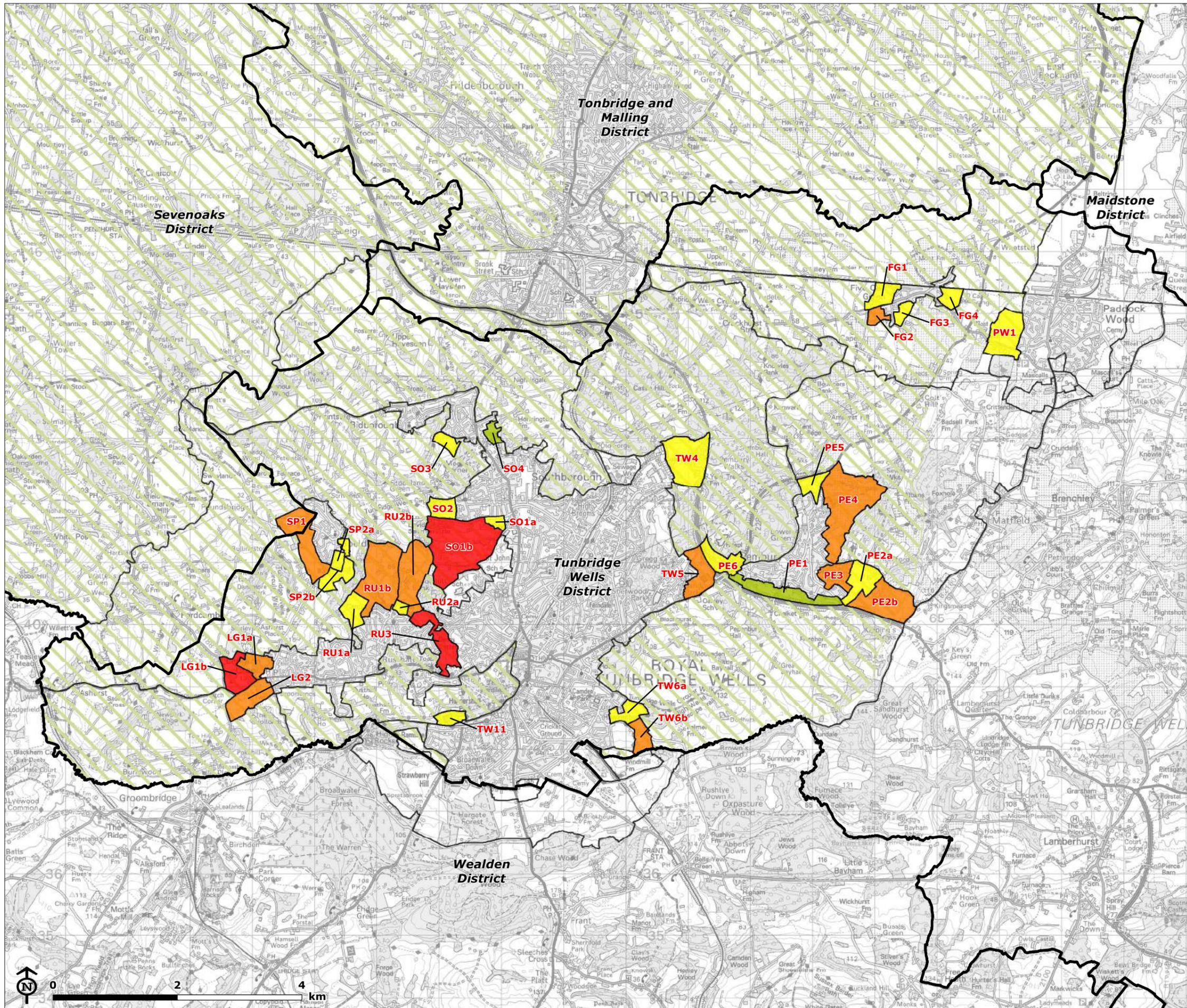
- District boundary
- Green Belt
- Level of harm caused by release of broad area**
- Very high
- High
- Moderate
- Low
- Very low

Map Scale @ A3: 1:60,000



Tunbridge Wells Green Belt Review

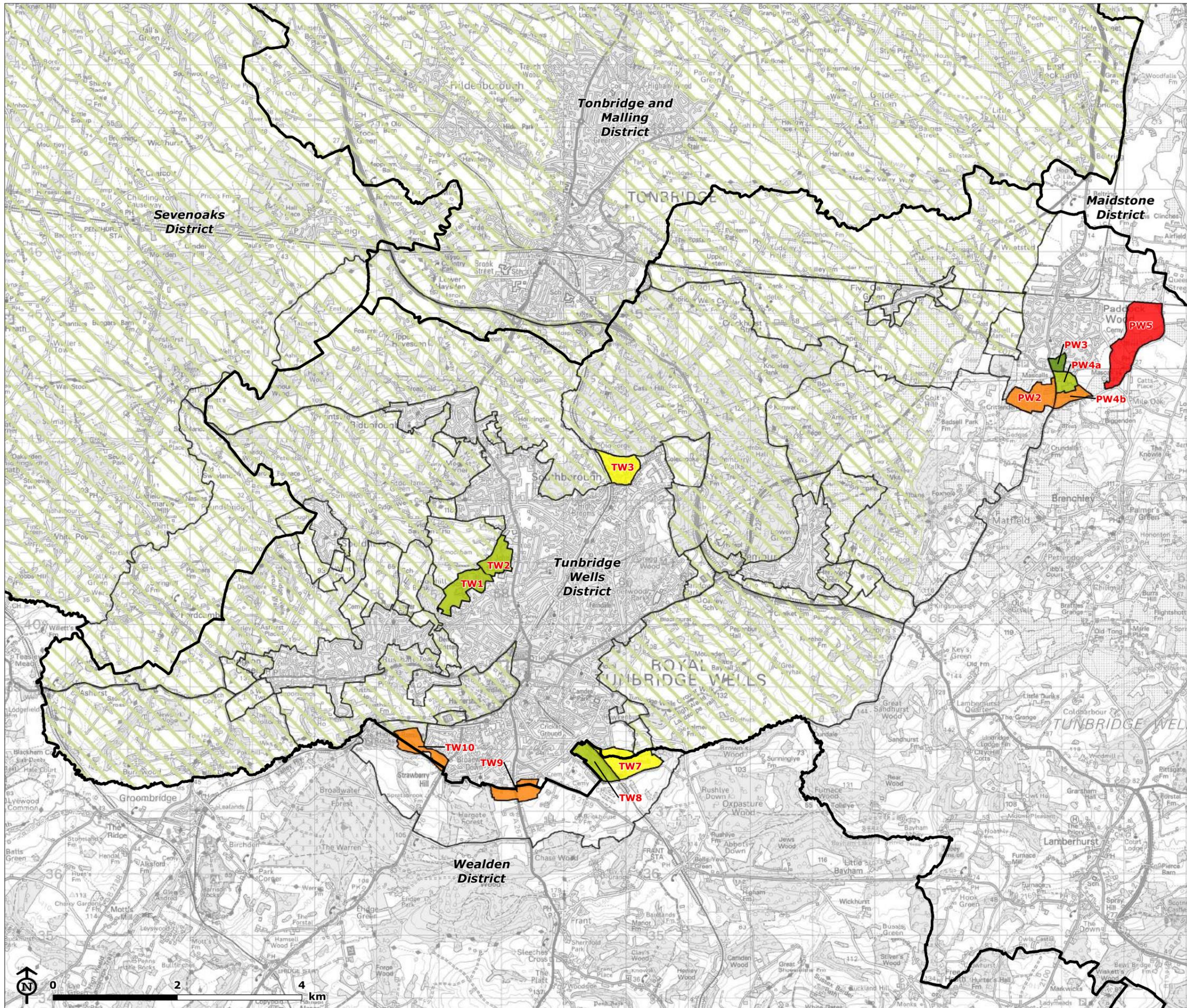
Figure 1.2: Potential Level of Harm to the Green Belt Associated with Release of Green Belt Parcels



- District boundary
- Level of harm caused by release of Green Belt parcel**
- Very high
- High
- Moderate
- Low
- Very low

Map Scale @ A3: 1:60,000





Tunbridge Wells Green Belt Review

Figure 1.3: Potential Level of Harm Associated with Parcels outside of Green Belt, or partly within District that has no Green Belt

□ District boundary

Level of harm :

- Very high
- High
- Moderate
- Low
- Very low

Map Scale @ A3: 1:60,000



2 Introduction

- 2.1 This report follows on from the **Tunbridge Wells Borough Green Belt Strategic Study** produced by LUC in October 2016. The Strategic Study set out the planning and policy context for the Green Belt around Royal Tunbridge Wells and included a strategic assessment of the Green Belt in the Borough in the context of the wider Metropolitan Green Belt. One of the outputs from the study was identification of further areas where a 'Stage Two' Green Belt study was recommended.
- 2.2 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 on housing, the local economy, retail and the environment.
- 2.3 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 an unconstrained need for 648 homes per year over the 2013-33 period¹.
- 2.4 The NPPF requires that Councils ensure, as far as is consistent with policies set out in the Framework, 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 the High Weald Area of Outstanding Natural Beauty (AONB) and/ or Green Belt designation, whilst its location close to London and within the south-east puts it under considerable pressure as a focus for potential growth.
- 2.5 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 of the Tunbridge Wells Borough Strategic Green Belt Study).
- 2.6 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".
- 2.7 Since TWBC is currently reviewing its Local Plan, the Council has taken the opportunity to review the Green Belt designation in the context of i) changes in the Borough since the designation of Green Belt around Tunbridge Wells, as set out in the 1980 Kent Structure Plan, was formally accepted by Central Government²; and ii) potential future changes which may be required to accommodate a growing population.

Housing White Paper

- 2.8 As part of its recent White Paper on housing policy (Fixing our broken housing market, February 2017), the Government has proposed amendments to the NPPF to make the circumstances in which Green Belt boundaries can be amended more 'transparent'. Local authorities will only be able to alter Green Belt boundaries after they have "examined fully all other reasonable options for meeting their identified development requirements". In particular, they will have to give

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

² See Tunbridge Wells Borough Strategic Green Belt Study – paragraphs 2.12 – 2.19.

consideration to suitable brownfield sites, estate generation, underused and public sector land, and whether their development needs can be met by neighbouring authorities.

- 2.9 If local authorities are able to meet these conditions, they will also be required to 'offset' the removal of land from the Green Belt by way of "*compensatory improvements to the environmental quality or accessibility of remaining Green Belt land*". This refers to the wider benefits that Green Belts can deliver e.g. for access, sport, recreation, flood alleviation, ecology, landscape and visual amenity etc.
- 2.10 The White Paper proposes that national policy will make it clear that when carrying out a Green Belt Review, local planning authorities should look first at using any Green Belt land which has been previously used and/or which surrounds transport hubs.
- 2.11 The White Paper also indicates an intention to introduce a standardised method for the calculation of objectively assessed need for housing (OAN), the principal intentions being to speed up plan-making and to ensure that local authorities do not produce unrealistically low OAN figures. It is anticipated that this will be introduced early in 2018.
- 2.12 It remains to be seen how these proposed changes will become formally embodied in legislation and policy.

3 Project Scope and Approach

Project Scope

- 3.1 This Stage Two review is a more detailed and focussed review of parcels of land within and adjacent to the Green Belt around settlements in Tunbridge Wells Borough, as identified in the Tunbridge Wells Borough Green Belt Strategic Study. The assessment is undertaken in relation to the contribution of areas of land to each of the five Green Belt Purposes.
- 3.2 In order that the Green Belt study is comprehensive rather than selective it covers all Green Belt in the District. It employs the same methodology for all areas, but through definition of smaller parcels of land is able to focus in more detail on those locations where there is more likely to be potential for sustainable development.
- 3.3 Although the existence of the Rural Fringe designation (i.e. safeguarded land) is not a consideration in this assessment, all of the designated Rural Fringe sites do fall within proposed Stage Two parcels. In addition, four parcels, TW7, TW8, TW9 and TW10, include land within Wealden District that abuts Royal Tunbridge Wells.
- 3.4 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 case for development, so a review of Green Belt contribution is only one aspect of the review process.
- 3.5 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. 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.

Approach

- 3.6 The **Tunbridge Wells Borough Green Belt Strategic Study** set out the considerations which informed the approach to that analysis. These are equally relevant to the Stage Two study and so are replicated in the paragraphs below.

Guidance

- 3.7 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 inappropriate’.
- 3.8 The NPPF refers to two ‘essential characteristics’ of Green Belt: *Openness* and *Permanence*. It also refers to five purposes of Green Belt:
 - *Purpose 1: Check the unrestricted sprawl of large built-up areas;*
 - *Purpose 2: Prevent neighbouring towns from merging;*

- *Purpose 3: Assist in safeguarding the countryside from encroachment;*
- *Purpose 4: Preserve the setting and special character of historic towns; and*
- *Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land.*

3.9 The types of development identified as 'not inappropriate' in the Green Belt (NPPF Paragraph 89) are:

- 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;
- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

3.10 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 law, is that such development cannot be considered, regardless of size or location, to weaken contribution to Green Belt purposes.

3.11 Paragraph 90 of the NPPF identifies other forms of development which are 'not inappropriate', but in all cases this is subject to the requirement that they preserve the openness of the Green Belt, and do not conflict with the purposes of including land within it.

Establishing an approach to assessment

3.12 Since much of the terminology of the NPPF is open to interpretation, the principles of openness and permanence and the five Purposes have been considered and examined in order to establish a robust methodology for reviewing the performance of land against the Green Belt designation. This has been informed by Examination Inspectors' reports and case law, in addition to the Planning Advisory Service (PAS)³ and Planning Officers Society (POS)⁴ notes which provide useful discussion of some of the issues.

Openness

3.13 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.

3.14 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 impact⁵. 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

³ Planning on the Doorstep: The Big Issues –Green Belt (Peter Brett for Planning Advisory Service, 2015)

⁴ Approach to Review of the Green Belt (Planning Officers Society)

⁵ 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)

Inspector has stated that “The question of visual impact is implicitly part of the concept of “openness of the Green Belt”⁶.

- 3.15 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*” (see **paragraph 3.9** above).

Permanence

- 3.16 The concept of ‘permanence’ is to an extent a planning consideration rather than a physical one – reflected in the text from the Kent Countryside Local Plan (1983) which stated that the main function of the Metropolitan Green Belt was to “*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*”⁷. 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

- 3.17 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.
- 3.18 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 Belt⁸. Such assessments against the purposes should form the basis of any justification for releasing land from the Green Belt⁹. Green Belt reviews should also be ‘comprehensive’ rather than ‘selective’¹⁰.
- 3.19 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 case for development, so a review of Green Belt contribution is only one aspect of the review process.
- 3.20 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”.
- 3.21 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.

⁶ Paragraph 15 of Turner [2016] EWCA Civ 466, Arden, Floyd and Sales LJ

⁷ Kent Countryside Local Plan, 1983

⁸ Inspectors’ Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)

⁹ Inspector’s interim findings (H Stephens) to Durham City Council (November 2014)

¹⁰ Inspector’s report (A Thickett) to Leeds City Council (September 2014)

Considerations for Assessment against Green Belt Purposes

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

- 3.22 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.
- 3.23 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 Malling¹¹, 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"*.
- 3.24 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.

Purpose 2: Prevent neighbouring towns from merging

- 3.25 An area 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.
- 3.26 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.
- 3.27 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.

Purpose 3: Assist in safeguarding the countryside from encroachment

- 3.28 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.
- 3.29 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 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"*.

¹¹ Tonbridge and Malling Borough Council Local Plan - Green Belt Study (Tonbridge and Malling Borough Council, 2016)

- 3.30 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.

Purpose 4: Preserve the setting and special character of historic towns

- 3.31 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.
- 3.32 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.

Tunbridge Wells

- 3.33 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. 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 functional 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 Area Appraisal¹² states that *"The juxtaposition of landscape to built development within the town is a key part of its most distinctive character"*.
- 3.34 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 Area 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 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.
- 3.35 Tunbridge Wells has evolved principally out along the ridge lines that carry the major connecting routes but, as the Urban Design Framework¹³ 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.
- 3.36 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.
- 3.37 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

¹² Royal Tunbridge Wells and Rusthall Conservation Area Appraisal – TWBC (2000)

¹³ Royal Tunbridge Wells Urban Design Framework SPD (2015)

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.

Tonbridge

- 3.38 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.

Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 3.39 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.
- 3.40 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.

4 Areas for Assessment

- 4.1 The Strategic Study identified 36 parcels and 10 broad areas for assessment within the Stage Two review. These are shown on **Figure 4.1** and listed in **Table 4.1**.
- 4.2 The parcels identified represent areas in which there was considered to be a possibility that land may not be found to make a strong contribution to Green Belt Purposes. Some parcels were also identified 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.
- 4.3 All the defined parcels are located adjacent to the Limits to Built Development of settlements excluded from the Green Belt, reflecting an assumption that any potential strategic development into the Green Belt would represent an expansion of one of these settlements, rather than the creation of an area of entirely new settlement in a Green Belt location.
- 4.4 Some of the parcels identified in the Strategic Study have been further subdivided as part of the assessment process – see **5.5** below.
- 4.5 The ‘broad areas’ represent the parts of the borough and adjacent districts which were considered to clearly make a strong contribution to one or more Green Belt purposes in the Strategic Study. These areas represent countryside that is distinct from urban development, in which development would represent encroachment.
- 4.6 Taken together, parcels and broad areas include all of the Green Belt in the borough. In order to be comprehensive they do not exclude areas which may be subject to environmental constraints that would make built development unlikely, such as SSSIs, functional flood plain or ancient woodland; however the assessment methodology (set out in **Section 5** below) recognises such constraints as relevant when considering contribution to Green Belt purposes.
- 4.7 Parcels and broad area also in places extend beyond the borough boundaries, either to include land in neighbouring districts that has a strong relationship with urban edges in Tunbridge Wells borough, or to reach a suitable strong landscape feature to use as a parcel or broad area boundary.

Table 4.1 Stage Two parcels and broad areas

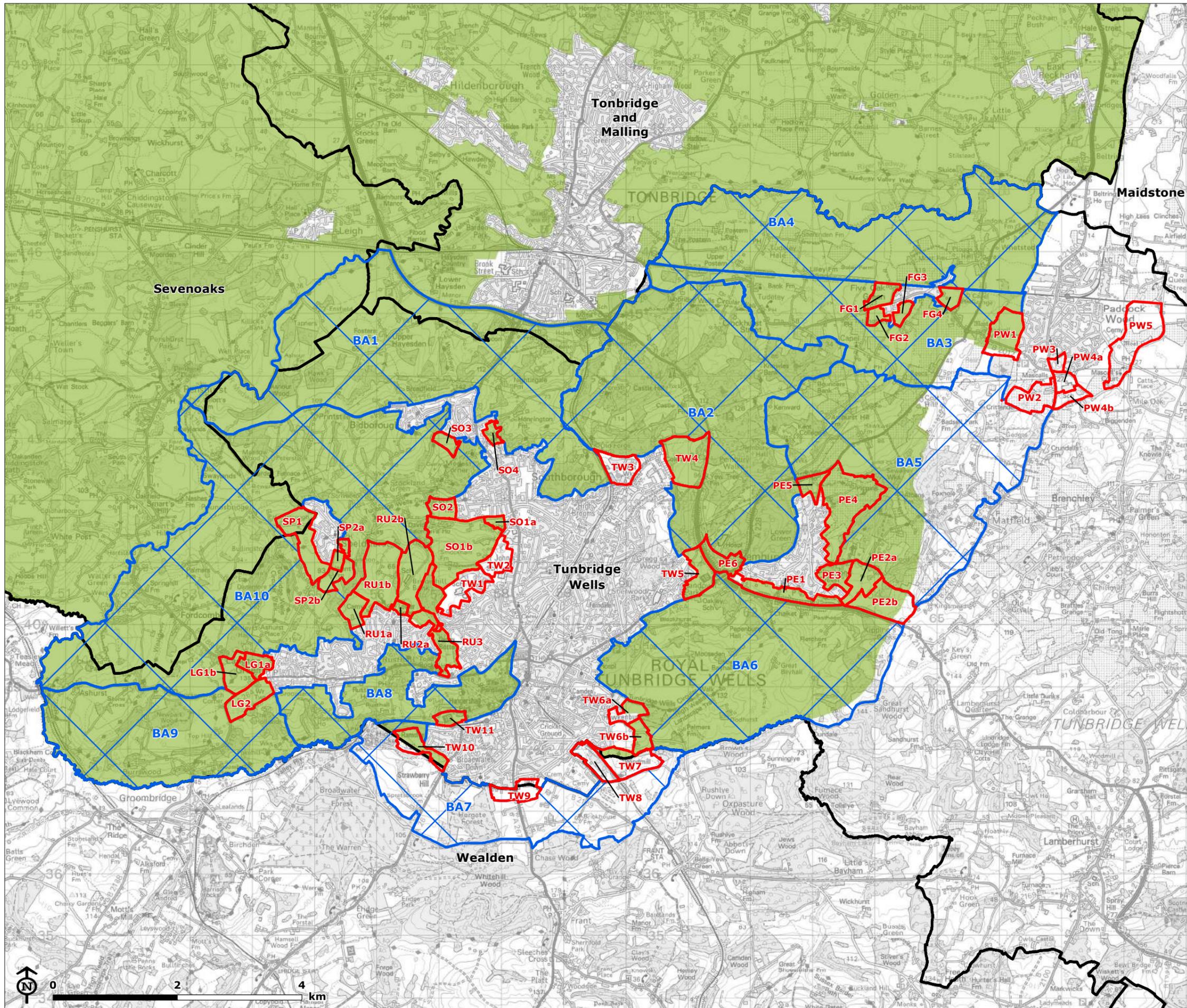
Settlement/area	Parcel/ broad area	Key Stage Two considerations
South west of Tonbridge	BA1	Contribution to preventing countryside encroachment, and as gap between Tonbridge and Tunbridge Wells
South east of Tonbridge	BA2	Contribution to preventing countryside encroachment, and as gap between Tonbridge 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

Settlement/area	Parcel/ broad area	Key Stage Two considerations
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	SO1a and b	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; it should be noted that most of PW1 is located within Capel Parish
	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)
	PW4a and b	Relationship between settlement and countryside and connectivity with existing Green Belt (parcel is outside of Green Belt)
	PW5	Relationship between settlement and countryside and connectivity with existing Green Belt (parcel is outside of Green Belt)
Pembury	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
	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

Settlement/area	Parcel/ broad area	Key Stage Two considerations
		reference to relationship with existing urban area and role of A21 in forming barrier to encroachment/sprawl
Tunbridge Wells	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
	TW6a and b	Relationship between settlement and countryside, with reference to role of High Wood in forming barrier to encroachment/sprawl
	TW7	Relationship between settlement and countryside (most of the parcel is in Wealden District)
	TW8	Relationship between settlement and countryside, with reference to extent of containment by settlement, railway and woodland (the parcel is in Wealden District, and part of it is allocated for development)
	TW9	Relationship between settlement and countryside, and potential role in historic setting of Tunbridge Wells (most of the parcel is in Wealden District)
	TW10	Relationship between settlement and countryside, and potential role in historic setting of Tunbridge Wells (part of the parcel is in Wealden District)
	TW11	Relationship between settlement and countryside, and potential role in historic setting of Tunbridge Wells
Rusthall	RU1a and b	Relationship between settlement and countryside and role in gap between Rusthall, Speldhurst and Tunbridge Wells
	RU2a and b	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 contribution to historic setting of the latter
Langton Green	LG1a and b	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
	SP2a and b	Relationship between settlement and countryside; role of wooded ghyll in forming barrier to encroachment/sprawl

Figure 4.1: Assessment Parcels

-  District boundary
-  Green Belt
-  Assessment parcel
-  Broad area



Map Scale @ A3: 1:60,000



5 Methodology

Process

- 5.1 The project has involved a combination of desk study and field survey. Field survey was undertaken between November 2016 and January 2017.

Assessment Principles

- 5.2 The five purposes of Green Belt, with the exception of purpose 5 (assistance in urban regeneration), as well as the two 'essential characteristics' of openness and permanence (as discussed in **Section 3**) have been used to identify a number of factors which influence the performance of land in Green Belt terms. The following factors have been identified:
- **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 environmental 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 Ratings

- 5.3 The assessment of contribution of the parcel or broad area to each of the purposes 1-4 is established using professional judgement based on the four factors above in the context of the 'relationship between settlement and countryside'. The judgement does not apply any predetermined weighting to any of the four factors.
- 5.4 The following tables set out the definitions used to inform the ratings for each Green Belt purpose. For each purpose a 5-point scale is used, assessing land as making either a strong, relatively strong, moderate, relatively weak or weak/no contribution. The tables also give an indication as to how each of the four factors affects the rating against each purpose.
- 5.5 Contribution to Green Belt purposes may be found to vary within a parcel. Where the assessment has found variations that would affect overall contribution to Green Belt purposes (see **Table 5.1** below) this has been reflected by subdividing the parcel – e.g. parcel SO1 has been split into SO1a and SO1b. Subdivision has only been carried out where the resultant parcels are in the order of 5ha or larger; smaller variations may be noted in the assessment text but ratings reflect the contribution applicable to the majority of the area.
- 5.6 The settlements identified as being relevant to purposes 1, 2 and 4 – i.e. 'large built-up areas', 'towns' and 'historic towns' – were defined in the **Tunbridge Wells Borough Green Belt Strategic Study** as shown in **Table 5.1** below:

Table 5.1 Settlement Hierarchy of Settlements in or adjacent to the Green Belt

Settlement type	Settlement
Large built-up area	Royal Tunbridge Wells_+ Southborough + Pembury + Rusthall + Langton Green + Bidborough
	Tonbridge (Tonbridge and Malling District)
Town	Royal Tunbridge Wells
	Paddock Wood
	Tonbridge
	Southborough
	Pembury
Historic Town	Royal Tunbridge Wells
	Tonbridge

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

- 5.7 This study defines 'large built-up areas' as Tunbridge Wells built-up area (which includes Royal Tunbridge Wells, Southborough, Bidborough, Rusthall, Langton Green and Pembury) and Tonbridge. 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.

Definition of ratings for Purpose 1

Development/land-use: less development = stronger contribution

Location: closer to settlement = stronger contribution

Separating features: stronger relationship with countryside than settlement = stronger contribution

Connecting features: weaker relationship between settlement and countryside = stronger contribution

<i>Strong Contribution</i>	The parcel is adjacent to the large built-up area but has some separation from it and relates strongly to the wider countryside – development would represent significant expansion of the large built-up area into countryside
<i>Relatively Strong Contribution</i>	The parcel is adjacent to the large built-up area but relates more strongly to the wider countryside
<i>Moderate Contribution</i>	The parcel is adjacent to the large built-up area and either relates to both the settlement and the wider countryside or has a degree of separation from both
<i>Relatively Weak Contribution</i>	The parcel is adjacent to the large built-up area and relates more strongly to this than to the wider countryside; or The parcel is not adjacent to the large built-up area, but has sufficient connection for development here to have some association with it
<i>Weak/No Contribution</i>	The parcel is not adjacent to the large built-up area and development here would be associated with a different settlement

Purpose 2: Prevent neighbouring towns from merging

- 5.8 The settlements considered for assessment against purpose 2 are Tunbridge Wells built-up area (including Royal Tunbridge Wells, Southborough, Bidborough, Rusthall, Langton Green and Pembury), Southborough, Pembury, Tonbridge and Paddock Wood.
- 5.9 Although Southborough and Royal Tunbridge Wells have coalesced, Southborough is treated as a town in local planning policy and is therefore included in the study for assessment against purpose 2. Although Pembury is a large village rather than a town, it is not much smaller than Paddock Wood; and 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.

Definition of ratings for Purpose 2

Development/land-use: less development = stronger contribution

Location: where a parcel lies between towns = stronger contribution. Where the parcel lies between smaller settlements it may be relevant to this Purpose if the reduction in the gap between them would also lead to the reduction in the perception of separation between towns.

Separating features: lack of separating features between towns = stronger contribution because the presence of strong separating features (such as landform or land cover) create a perception of separation.

Connecting features: stronger relationship between towns = stronger contribution

Strong
Contribution

Development of this parcel would result in physical or visual coalescence of towns, or a significant narrowing of the physical gap with no landscape elements to preserve separation.

Relatively Strong
Contribution

Development of this parcel would result in a significant narrowing of the physical gap between towns; or
Development of this parcel would result in physical or visual coalescence of settlements which form a significant proportion of the land between towns

Moderate
Contribution

Development of this parcel would result in significant narrowing of the physical gap, but landscape feature(s) would preserve a sense of separation; or
Development of this parcel would result in a moderate narrowing of the physical gap, but with no landscape feature(s) to preserve separation.

Relatively Weak
Contribution

Development of this parcel would result in a moderate narrowing of the physical or perceived gap, but with landscape feature(s) to preserve separation.

Weak/No
Contribution

Development of this parcel would result in little or no perception of the narrowing of the gap between towns.

Purpose 3: Assist in safeguarding the countryside from encroachment

- 5.10 The term 'countryside' is considered to apply, to a greater or lesser degree, to all land defined as Green Belt.

Definition of ratings for Purpose 3

Development/land-use: less urbanising land use and more openness = stronger contribution. Less development and the extent to which the land is characteristic of countryside (i.e. lack of development and rural land uses).

Location: further from settlement = stronger contribution

Definition of ratings for Purpose 3

Size: larger parcel = stronger contribution

Separating features: stronger relationship with countryside than settlement = stronger contribution. Edges and boundaries

Connecting features: weaker relationship between settlement and countryside = stronger contribution

Strong Contribution	The parcel relates strongly to the wider countryside, has a sense of separation from the settlement and lacks urbanising development – development would represent encroachment into the countryside.
Relatively Strong Contribution	The parcel relates more strongly to the wider countryside than the settlement and lacks urbanising development.
Moderate Contribution	The parcel relates to both the settlement and the wider countryside or has a degree of separation from both; or The parcel relates more strongly to the wider countryside than to the settlement, but openness is compromised by urbanising development within it.
Relatively Weak Contribution	The parcel relates more strongly to the settlement than to the wider countryside; or The parcel relates to both the settlement and the wider countryside, or has a degree of separation from both, but openness is compromised by urbanising development within it.
Weak/No Contribution	The parcel is too lacking in openness to be considered countryside, or has little countryside within it and lacks relationship with the wider Green Belt countryside.

Purpose 4: Preserve the setting and special character of historic towns

5.11 This study defines historic towns as Royal Tunbridge Wells and Tonbridge.

Definition of Ratings for Purpose 4

Development/land-use: less development = stronger contribution

Location: contains key characteristics, or important in views to or from them = stronger contribution

Separating features: lack of features to increased perceived separation from historic town = stronger contribution

Connecting features: stronger relationship between historic town and countryside = stronger contribution

Development/land-use: less development = stronger contribution

Location: contains key characteristics, or important in views to or from them = stronger contribution

Separating features: lack of features to increased perceived separation from historic town = stronger contribution

Connecting features: stronger relationship between historic town and countryside = stronger contribution

Definition of Ratings for Purpose 4	
Strong Contribution	The parcel's openness is a key element in the relationship between the settlement and key characteristics identified as contributing to special character or historic setting – development would detract significantly from the town's historic character
Relatively Strong Contribution	The parcel's openness contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting – development would detract from the town's historic character
Moderate Contribution	The parcel's openness contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting, but development would have only a moderate impact on historic character
Relatively Weak Contribution	The parcel forms a minor element in the setting of an historic town; or forms a more major element but has limited openness
Weak/No Contribution	The parcel does not form part of the setting of an historic town

Green Belt Boundary Strength

- 5.12 Comments are made to indicate whether the existing Green Belt boundary is weak and if so whether there is potential to create a stronger boundary within the parcel (this will not be relevant for broad areas).

Overall Contribution and Harm

- 5.13 Given that there is no guidance on what constitutes a 'strong' contribution to Green Belt, and indeed no formal link between level of contribution to Green Belt purposes and actual release of Green Belt land, LUC considers that there can be no presumption as to how multiple lower ratings equate to single high ratings. Individual parcel assessments do not therefore include totalling of ratings.
- 5.14 However, it is not unreasonable to assume that a parcel that rates highly against a number of different purposes potentially has more value in Green Belt terms than one which rates highly against only one purpose – e.g. a parcel in which development would be considered encroachment on countryside *and* would also potentially represent sprawl from a large built-up area. Assessment output therefore includes mapping which illustrates this (see Assessment Findings section below).
- 5.15 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.
- 5.16 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 potential harm to Green Belt purposes that could result from release of Green Belt

land; the presumption being that this would result in some degree of development. If a parcel achieves a higher rating against a particular purpose, this implies greater harm to the fulfilment of that Green Belt purpose should the land be released for development.

- 5.17 **Table 5.2** shows the method for assessing the likely harm to the Green Belt purposes if land within a parcel were released through the Local Plan to accommodate new development. This is an assessment of individual land parcels, without knowledge of potential development scenarios within a parcel or of the cumulative picture of potential development. A more refined assessment of harm, considering the impact of Green Belt release on the contribution of adjacent retained Green Belt, can be carried out if development scenarios are suggested.
- 5.18 For those parcels that are not in the Green Belt the question of harm resulting from release is not relevant, but the harm rating can still be taken as an indicator of the role of the land in question in terms of the relationship between settlement and countryside.
- 5.19 Also, 'harm' is considered only in terms of Green Belt purposes, so other relevant development management considerations, such as impact on functional use of the land, on visual character or on traffic, do not have an influence. 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.
- 5.20 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).

Table 5.2: Framework for assessing potential harm

Stage Two assessment of parcels	Level of harm caused by release of parcel
Makes a STRONG contribution to one or more GB purposes.	Very high
Makes a RELATIVELY STRONG contribution to one or more GB purposes. No strong contribution to any purpose.	High
Makes a MODERATE contribution to one or more GB purposes. No strong or relatively strong contribution to any purpose.	Moderate
Makes a RELATIVELY WEAK contribution to one or more GB purposes. No strong, relatively strong or moderate contribution to any purpose.	Low
Makes a WEAK/NO contribution to one or more GB purposes. No strong, relatively strong, moderate or relatively weak contribution to any purpose.	Very low

Output structure

- 5.21 The assessment output is presented on a settlement by settlement basis, with broad area assessments presented separately.
- 5.22 For each settlement or broad area a map (on a 1:10,000 or 1:25,000 OS base) is provided to show the defined parcels.

Parcel assessment layout

- 5.23 Each parcel/broad area assessment consists of:
- A map showing the parcel in relation to the settlement edge, together with any areas of primary or secondary constraint;

- Development/land-use: this section describes the extent and nature of development and principal land uses;
- Parcel boundaries: this describes the key features of the parcel boundaries, with reference to the nature of land beyond those boundaries;
- Relationship between settlement and countryside: this section describes the relationship between the settlement and countryside with reference to the four factors of development and land use; location in relation to settlement; separating features (landscape elements such as woodland blocks, rivers, ridges or areas of primary constraint such as SSSIs); and connecting features (landscape elements such as roads or rail links, which can reduce the impact of separating features, and valley landforms where land on either slope has a strong visual connection).
- Contribution to Green Belt purposes: this section contains the ratings for the parcel or broad area against each Green Belt purpose. Purpose 5 is included for completeness, but with comments to indicate that all parcels are considered to make an equal contribution;
- Green Belt boundary strength: this section indicates whether the existing Green Belt boundary is weak and if so whether there is potential to create a stronger boundary within the parcel (this will not be relevant for broad areas).

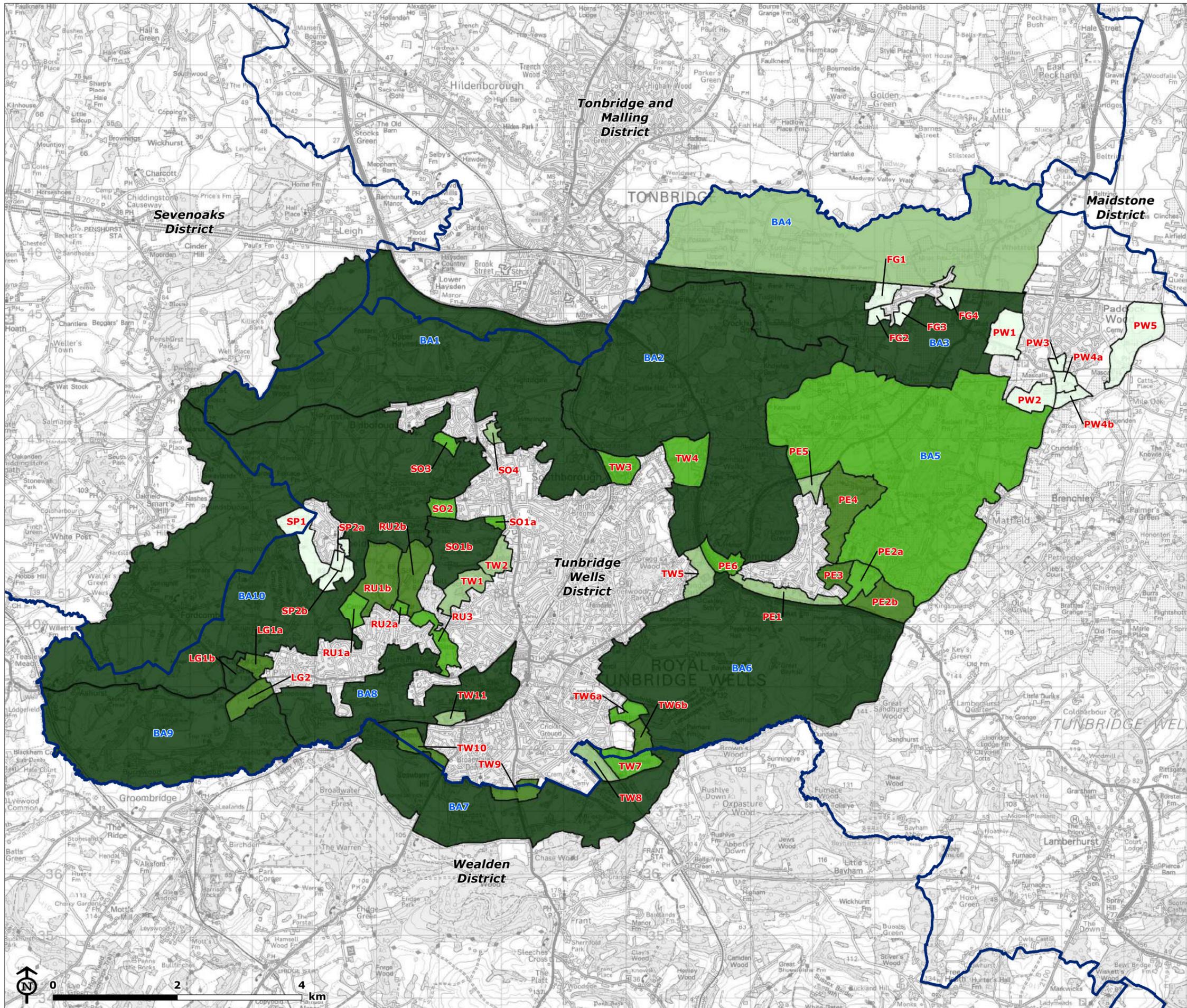
6 Assessment Results

Parcel and Broad Area Ratings

- 6.1 Assessments for each of the parcels and broad areas are set out in **Appendix A** below.
- 6.2 **Table 6.1** below lists the ratings assigned to each parcel and each broad area for each of the Green Belt purposes set out in the NPPF.
- 6.3 **Figures 6.1 – 6.4** map the results of the assessment of contribution to each of the four assessed Green Belt purposes, and **Figure 6.5** maps the potential overall harm rating for each parcel and broad area.

Table 6.1: assessment results summary

Broad Area	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Overall Harm Rating
BA1	Broad Area	Strong	Strong	Strong	Strong	Very high
BA2	Broad Area	Strong	Strong	Strong	Moderate	Very high
BA3	Broad Area	Strong	Strong	Strong	Weak or no contribution	Very high
BA4	Broad Area	Relatively weak	Strong	Strong	Relatively weak	Very high
BA5	Broad Area	Moderate	Strong	Strong	Relatively weak	Very high
BA6	Broad Area	Strong	Strong	Strong	Strong	Very high
BA7	Broad Area	Strong	Weak or no contribution	Strong	Moderate	Very high
BA8	Broad Area	Strong	Weak or no contribution	Relatively strong	Strong	Very high
BA9	Broad Area	Strong	Weak or no contribution	Strong	Moderate	Very high
BA10	Broad Area	Strong	Relatively strong	Strong	Strong	Very high
Parcel	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Overall Harm Rating
FG1	Five Oak Green	Weak or no contribution	Weak or no contribution	Moderate	Weak or no contribution	Moderate
FG2	Five Oak Green	Weak or no contribution	Weak or no contribution	Relatively strong	Weak or no contribution	High
FG3	Five Oak Green	Weak or no contribution	Weak or no contribution	Moderate	Weak or no contribution	Moderate
FG4	Five Oak Green	Weak or no contribution	Relatively weak	Moderate	Weak or no contribution	Moderate
LG1a	Langton Green	Relatively strong	Weak or no contribution	Relatively strong	Weak or no contribution	High
LG1b	Langton Green	Strong	Weak or no contribution	Strong	Weak or no contribution	Very high
LG2	Langton Green	Relatively strong	Weak or no contribution	Relatively strong	Weak or no contribution	High
PE1	Pembury	Relatively weak	Relatively weak	Relatively weak	Relatively weak	Low
PE2a	Pembury	Moderate	Weak or no contribution	Moderate	Weak or no contribution	Moderate
PE2b	Pembury	Relatively strong	Weak or no contribution	Relatively strong	Weak or no contribution	High
PE3	Pembury	Relatively strong	Weak or no contribution	Relatively strong	Weak or no contribution	High
PE4	Pembury	Relatively strong	Weak or no contribution	Relatively strong	Weak or no contribution	High
PE5	Pembury	Relatively weak	Weak or no contribution	Moderate	Weak or no contribution	Moderate
PE6	Pembury	Moderate	Moderate	Relatively weak	Weak or no contribution	Moderate
PW1	Paddock Wood	Weak or no contribution	Relatively weak	Moderate	Weak or no contribution	Moderate
PW2	Paddock Wood	Weak or no contribution	Weak or no contribution	Relatively strong	Weak or no contribution	High
PW3	Paddock Wood	Weak or no contribution	Very low			
PW4a	Paddock Wood	Weak or no contribution	Weak or no contribution	Relatively weak	Weak or no contribution	Low
PW4b	Paddock Wood	Weak or no contribution	Weak or no contribution	Relatively strong	Weak or no contribution	High
PW5	Paddock Wood	Weak or no contribution	Weak or no contribution	Strong	Weak or no contribution	Very high
RU1a	Rusthall	Moderate	Weak or no contribution	Moderate	Moderate	Moderate
RU1b	Rusthall	Relatively strong	Weak or no contribution	Relatively strong	Relatively strong	High
RU2a	Rusthall	Moderate	Weak or no contribution	Moderate	Moderate	Moderate
RU2b	Rusthall	Relatively strong	Weak or no contribution	Relatively strong	Relatively strong	High
RU3	Rusthall	Moderate	Weak or no contribution	Moderate	Strong	Very high
SO1a	Southborough	Moderate	Moderate	Moderate	Relatively weak	Moderate
SO1b	Southborough	Strong	Relatively strong	Strong	Relatively strong	Very high
SO2	Southborough	Moderate	Weak or no contribution	Moderate	Weak or no contribution	Moderate
SO3	Southborough	Moderate	Weak or no contribution	Moderate	Weak or no contribution	Moderate
SO4	Southborough	Relatively weak	Weak or no contribution	Relatively weak	Weak or no contribution	Low
SP1	Speldhurst	Weak or no contribution	Weak or no contribution	Relatively strong	Weak or no contribution	High
SP2a	Speldhurst	Weak or no contribution	Weak or no contribution	Moderate	Relatively weak	Moderate
SP2b	Speldhurst	Weak or no contribution	Weak or no contribution	Moderate	Relatively weak	Moderate
TW1	Tunbridge Wells	Relatively weak	Relatively weak	Relatively weak	Relatively weak	Low
TW2	Tunbridge Wells	Relatively weak	Relatively weak	Relatively weak	Relatively weak	Low
TW3	Tunbridge Wells	Moderate	Weak or no contribution	Relatively weak	Relatively weak	Moderate
TW4	Tunbridge Wells	Moderate	Weak or no contribution	Relatively weak	Relatively weak	Moderate
TW5	Tunbridge Wells	Relatively weak	Relatively strong	Moderate	Relatively weak	High
TW6a	Tunbridge Wells	Moderate	Weak or no contribution	Moderate	Moderate	Moderate
TW6b	Tunbridge Wells	Relatively strong	Weak or no contribution	Relatively strong	Relatively weak	High
TW7	Tunbridge Wells	Moderate	Weak or no contribution	Moderate	Relatively weak	Moderate
TW8	Tunbridge Wells	Relatively weak	Weak or no contribution	Relatively weak	Weak or no contribution	Low
TW9	Tunbridge Wells	Relatively strong	Weak or no contribution	Relatively strong	Relatively weak	High
TW10	Tunbridge Wells	Relatively strong	Weak or no contribution	Relatively strong	Relatively strong	High
TW11	Tunbridge Wells	Relatively weak	Weak or no contribution	Moderate	Relatively weak	Moderate



Tunbridge Wells Green Belt Review

Figure 6.1: Purpose 1: Check the Unrestricted Sprawl of Large Built up Areas

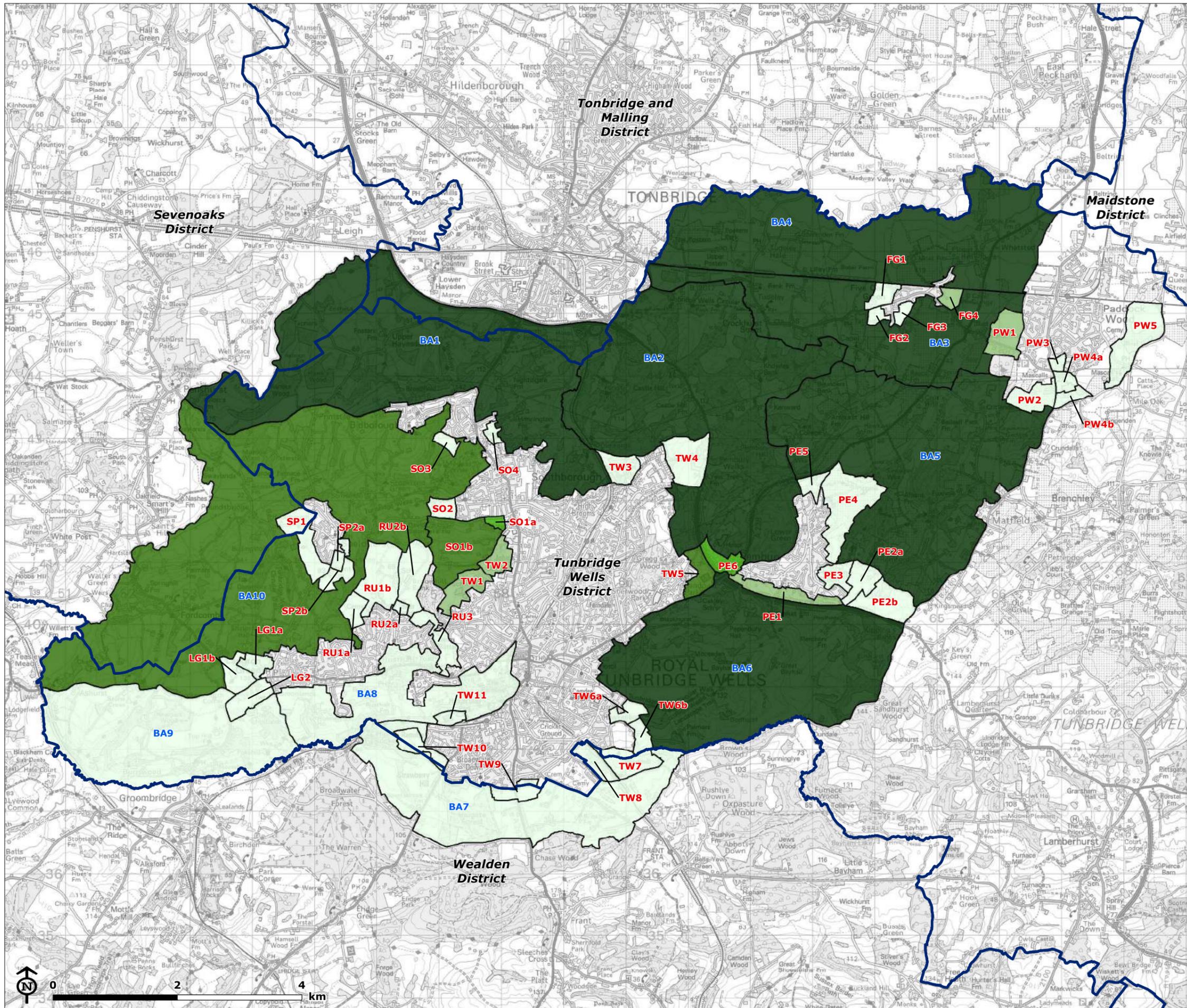
- District boundary
- Rating**
- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak or no contribution

Map Scale @ A3: 1:60,000



Tunbridge Wells Green Belt Review

Figure 6.2: Purpose 2: Prevent Neighbouring Towns Merging into one Another



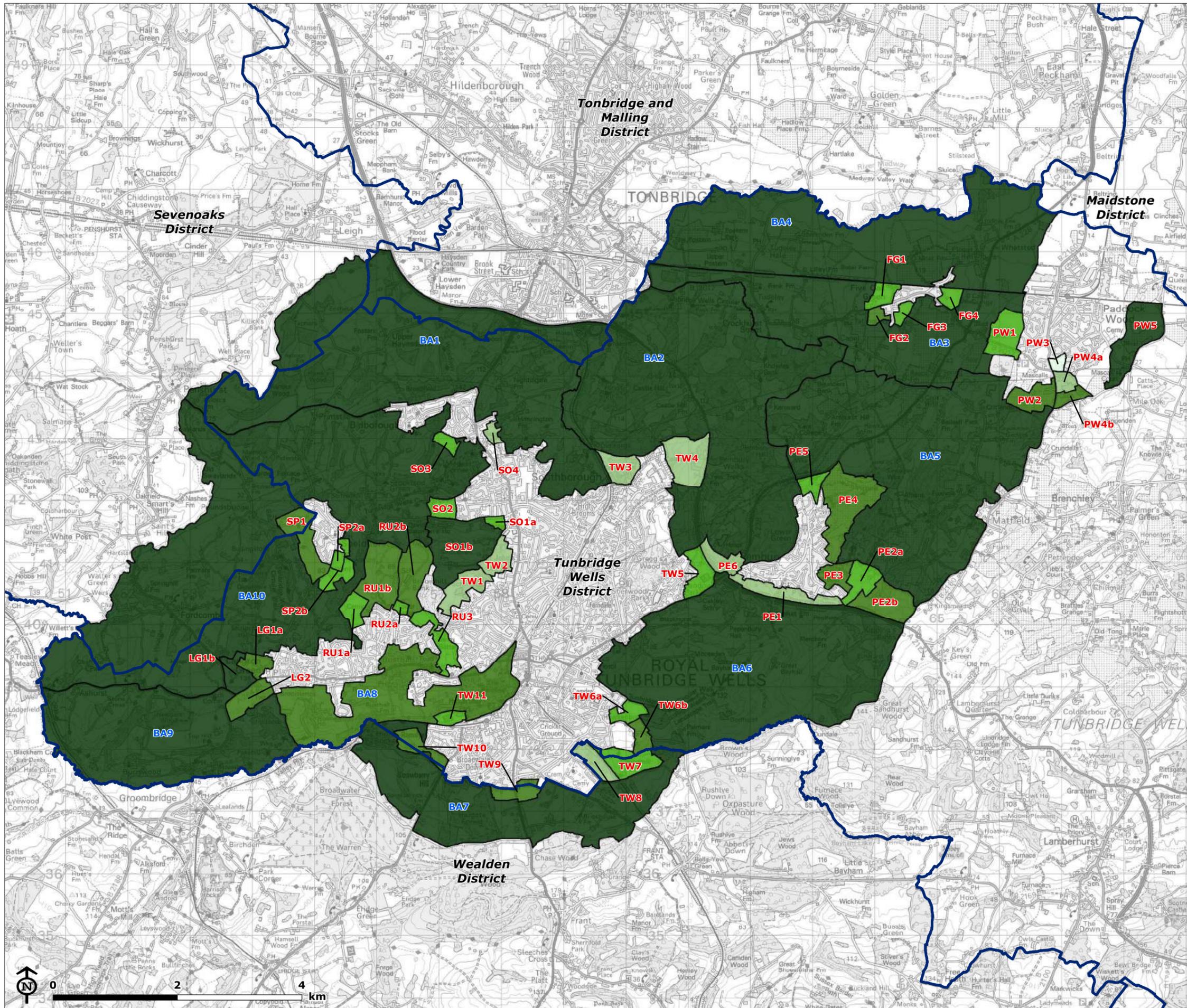
□ District boundary

Rating

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak or no contribution

Map Scale @ A3: 1:60,000





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Figure 6.3: Purpose 3: Assist in Safeguarding the Countryside from Encroachment

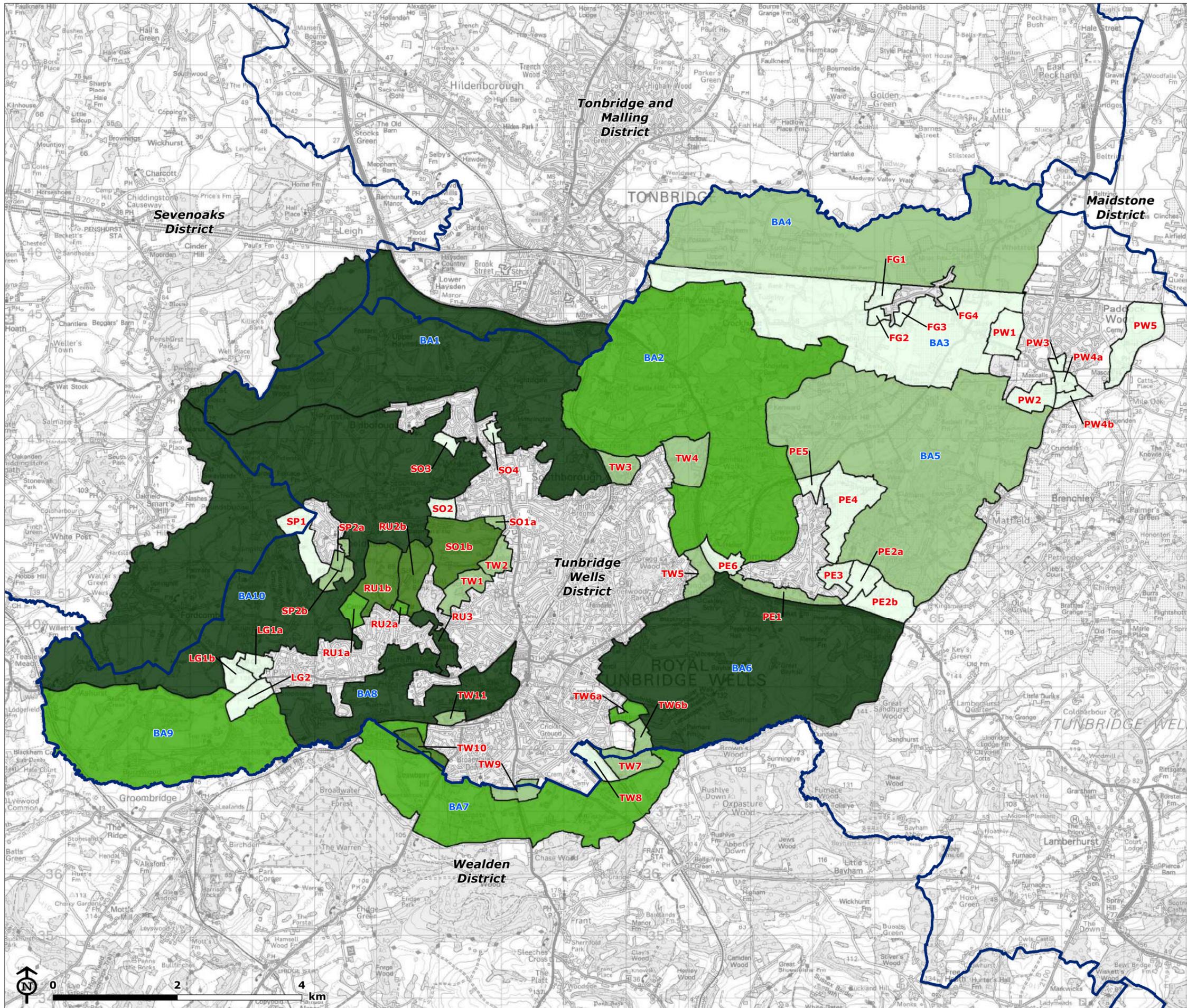
- District boundary
- Rating**
- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak or no contribution

Map Scale @ A3: 1:60,000



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Figure 6.4: Purpose 4: Preserve the setting and special character of historic towns



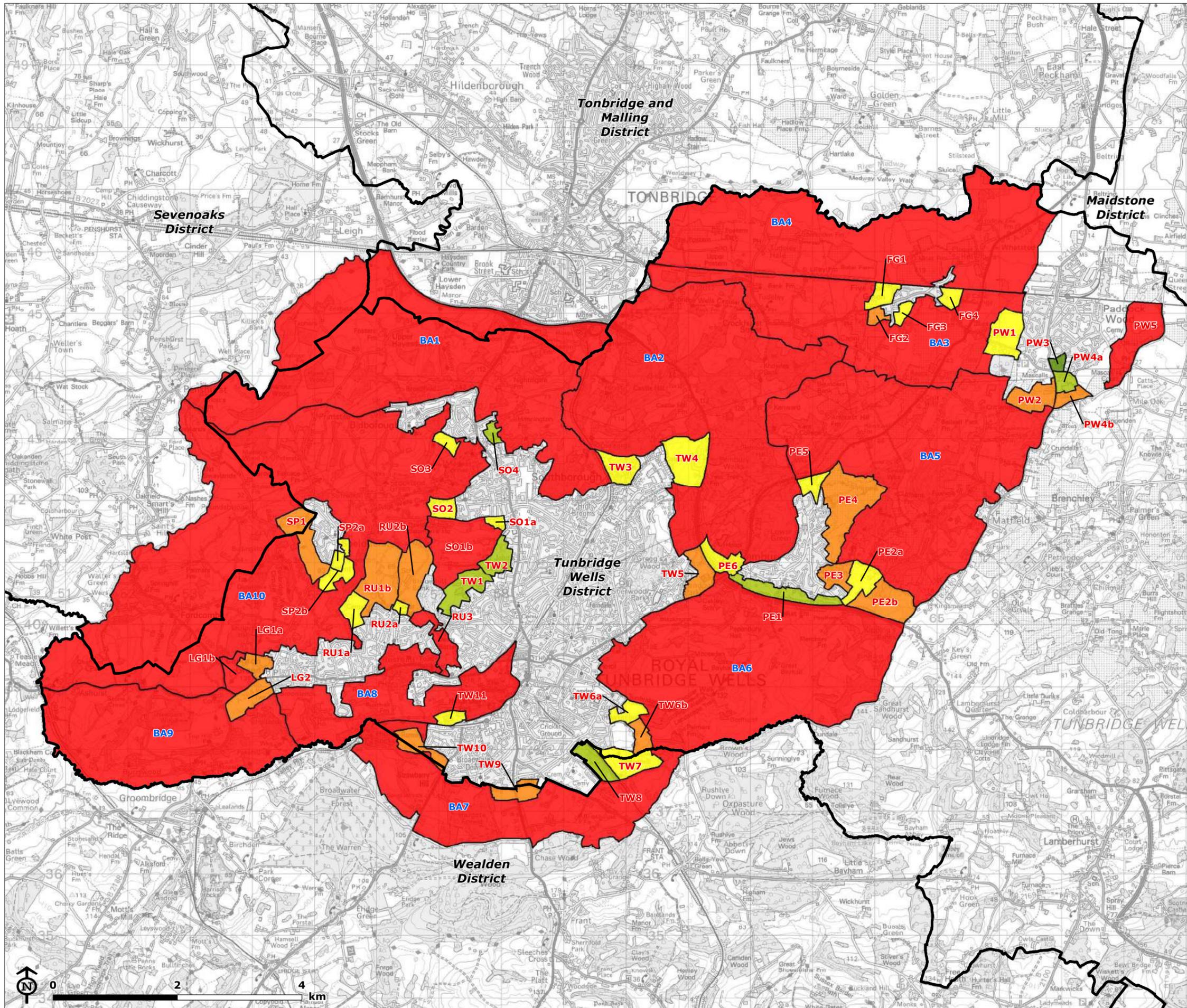
□ District boundary

Rating

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak or no contribution

Map Scale @ A3: 1:60,000





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Figure 6.5: Potential Level of Harm Associated with Release of Parcels

-  District boundary
- Level of harm caused by release of parcel**
-  Very high
-  High
-  Moderate
-  Low
-  Very low

Map Scale @ A3: 1:60,000



Beneficial Use of Green Belt

- 6.4 The NPPF suggests types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary/buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes. As part of its recent White Paper on housing policy¹⁴, the government has proposed that local authorities should seek to 'offset' the removal of land from the Green Belt by way of 'compensatory improvements to the environmental quality or accessibility of remaining Green Belt land'. **Table 6.2** provides some examples of beneficial use and enhancement of the Green belt that may be relevant in the borough.
- 6.5 As foreshadowed in the Housing White Paper, beneficial uses could be achieved through legal agreements in conjunction with the release of land and planning consent for development.

Table 6.2: potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open access provision. Uses of the countryside that permit an appreciation of it as a connected area with valued characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoiding truncation by major roads, or provision of access along the Green Belt boundary to strengthen its role.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced. Increasing visual openness can also benefit Green Belt purposes: although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

Next Steps

- 6.6 The results of analysis of Green Belt contribution can be compared to assessments of environmental land value (including landscape, views, cultural heritage and biodiversity) and sustainability of potential development, to determine a range of potential development scenarios.

¹⁴ *Fixing our broken housing market* Presented to Parliament by the Secretary of State for Communities and Local Government by Command of Her Majesty, February 2017

- 6.7 It is suggested that these scenarios can be assessed in terms of potential harm resulting from release of Green Belt. High-level mitigation ideas, considering potential to offset either Green Belt harm, environmental harm or sustainability concerns, could be considered for each scenario, as a basis for final decisions regarding the proposed development strategy and any subsequent masterplan briefs.

Appendix A: Broad Area and Parcel Assessments