

Tunbridge Wells Local Plan Examination

Response to the Inspector's Questions relating to Matter 4 on behalf of Gleeson Strategic Land

TCPS 618C
May 2022

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Introduction

This response is on behalf of Gleeson Strategic Land (Gleeson) who have land interests at the south eastern edge of Tunbridge Wells at Sandown Park, on the northern side of Pembury Road (SHELAA site number 99). Gleeson submitted representations to the Pre-Submission Draft version of the Local Plan these have been recorded as 'Comment Numbers' 208, 209, 213, 221 and 222 on the Council's PSLP schedule of representations (Core Document number 3.125a).

Matter 4 – Principle of Green Belt Release

Issue 1 – Principle of Green Belt Release

- Q6. When drawing up or reviewing Green Belt boundaries, paragraph 142 of the Framework states that the need to promote sustainable patterns of development should be taken into account. How and where has the Council taken this into account?

The Council has concluded that in order to help meet housing requirement, it is necessary to release land from the Green Belt. It should however, be at the most sustainable locations having regard to public transport and other considerations in accordance with paragraphs 105 and 142 of the NPPF. The potential for housing development arising from Green Belt land release at the south eastern edge of Tunbridge Wells has not been reasonably assessed by the Council. Gleeson's submissions (which includes a Green Belt Assessment by EDP – see Appendix 1 attached) demonstrates that 70-80 dwellings could be allocated at this location, offset by compensatory measures that would improve the existing quality and accessibility of adjoining Green Belt land for public use as informal recreation and to secure in perpetuity, a landscape buffer function between the built up edge of Tunbridge Wells and the A21 bypass corridor to the east.

- Q7. Having decided to review the Green Belt boundary, how did the Council determine, at a strategic level, where alterations should be made in order to meet housing and employment needs?

The Council has been inconsistent in its approach to releasing Green Belt land around Royal Tunbridge Wells. Proposed allocations at AL/RTW5, AL/RTW14 and AL/RTW19) are directly comparable to the proposals put forward by Gleeson in responding to the Pre-Submission Draft version of the Local Plan in relation to land at Sandown Park at the south eastern edge of the town (SHELAA site number 99). The Council has provided no satisfactory justification as to why this 3 hectare site (leaving 3.3 hectares of enhanced

Green Belt land retained) could not be satisfactorily released for housing purposes to help meet the housing requirement in a highly sustainable location.

Issue 2 – Green Belt Review Methodology

- Q1. The *Green Belt Study Stage 1*⁹ identified 33 parcels and 10 broad areas for assessment at Stage 2. How were these areas defined and what were the boundaries based on?

Gleeson's land interests at Sandown Park, comprises an area of land within zone 'TW5' shown in 'Figure 6.1: Green Belt Parcels' at the Stage 1 Green Belt Study. Parcel TW5 comprises undeveloped land bounded by the built up edge of Tunbridge Wells to the west, Pembury Road to the south, the A21 bypass to the east and Blackhurst Lane to the north. The Study's Stage 1 consideration for parcel TW5 was the "*Relationship between settlement and countryside and roll in gap between Tunbridge Wells and Pembury, with reference to barrier role of A21*".

- Q2. The *Green Belt Study Stage 2*¹⁰ provides a more detailed and focused review of land parcels, assessed against the purposes of including land within the Green Belt in paragraph 138 of the Framework. How did the Council take the findings into account and use the evidence in the preparation of the Plan?

At the Stage 2 assessment stage, the Green Belt role of parcel TW5 was considered to be 'High' in Figure 1 (on a scale of between 'Very Low' and Very High) but from Table 6.1 it is unclear how a land lease rating of 'High' was arrived at as opposed to a 'Moderate' or even a 'Low' rating. Indeed, Gleeson consider this general assessment to be severely flawed in not considering an alternative for a partial release of parcel for housing purposes with compensatory Green Belt measures put in place to secure an open natural landscape between the eastern edge of the proposed housing area and the A21 dual carriageway to the east. This proposal has been independently considered in a Green Belt Assessment by EDP (May 2019) commissioned by Gleeson (and appended to its representations at the Pre-Submission Draft Plan stage) and the impact of the lease of the Green Belt land with compensatory measures, has been assessed as having a '**low contribution**' in terms of the continuing function of the Green Belt at this location primarily because it relates well to the existing urban edge. For convenience, the EDP Green Belt Assessment report is also appended to this Statement in relation to Matter 4.

- Q3. What was the purpose of the *Green Belt Study Stage 3*¹¹? Did it build upon the findings of the earlier studies, or, assess proposed site allocations?

The Council were aware of Gleeson's proposal at the time that the Stage 2 study was commissioned, and there was a further opportunity to review the Gleeson proposal at the time the Stage 3 study took place. This leaves

Council's assessment seriously flawed in failing to properly assess the merits of the Gleeson proposal as a more sustainable option than releasing other Green Belt land elsewhere.

Q4. Where the release of land from the Green Belt was found to have either high or very high levels of harm, how was this taken into account in the site selection process?

It is evident that the Council's Green Belt Studies that harm from parcels of potential land release recorded as 'high' or 'very high', resulted in these blocks of land being excluded from any proposals for the release of Green Belt land for development purposes. The process was flawed however, in failing to assess options to release Green Belt land in sustainable locations *within* the parcels identified (e.g. with TW5) and then to reassess the level of harm accordingly.

Q5. How was the potential for mitigation considered in the Green Belt studies? Was this considered on a consistent basis for all sites?

It is Gleeson's case that proposals for Green Belt land release have not been considered on a consistent basis by the Council. Gleeson's proposal for Green Belt land release at the south eastern edge of Tunbridge Wells, with compensatory Green Belt measures, is essentially the same as the Council has found acceptable and proposed for Green Belt land release elsewhere around Tunbridge Wells (for example proposed land allocations at AL/RTW5, AL/RTW14 and AL/RTW19). The only opportunity for Gleeson to be able to raise these concerns and have an independent assessment, is through the Examination process, even though so-called 'omission sites' are not the subject of the Examination itself.



**Land at
Sandown Park,
North of
Pembury Road,
Tunbridge
Wells**

**Green Belt
Assessment**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
**Gleeson Strategic
Land**

May 2019
Report Reference
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Plan

- Plan EDP G1** Environmental Planning Context
(edp3824_d014a 18 January 2019 OW/TR)

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Section 1

Introduction, Purpose and Methodology

- 1.1 The Environmental Dimension Partnership (EDP) Ltd have been appointed by Gleeson Strategic Land to prepare a Green Belt Assessment for potential residential development on Land at Sandown Park, North of Pembury Road, Tunbridge Wells ('the site'). The site location and boundary are shown on **Plan EDP G1**.
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Shrewsbury and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute¹ specialising in the assessment of the effects of proposed development on the landscape.
- 1.3 The site is located at the eastern edge of Tunbridge Wells and falls within the Tunbridge Wells Borough Council Local Planning Authority (LPA). The site is situated entirely within the Metropolitan green belt, which washes over most of the site context, as illustrated by **Plan EDP G1**.
- 1.4 The proposals for the site are illustrated on the Illustrative Masterplan at **Appendix EDP 1**. The 'Illustrative Masterplan' has been informed by this report and an accompanying Landscape and Visual Appraisal (LVA; ref. edp3824_r004a). The proposed development is for approximately 75 residential units with associated landscape and public open space. Development is limited to the western site area, with the eastern site area retained as open space.
- 1.5 This Green Belt Assessment is part of a suite of documents put forward to promote the site for allocation within the new *Tunbridge Wells Borough Local Plan*.

Purpose and Structure of this Green Belt Assessment

- 1.6 This purpose of the Green Belt Assessment is to test whether bringing forward sustainable development on this site would allow the key purposes of the Green Belt, in the context of the wider settlement of Tunbridge Wells, to be maintained, or possibly even enhanced. The assessment considers the extent to which a continued sense of openness can be maintained within the tract of land between Tunbridge Wells and Pembury, situated to the east.
- 1.7 In undertaking the assessment described here EDP has:
 - Undertaken a review of relevant designations and background documents, in **Section 2**;

¹ LI Practice Number 1010

- Assessed the existing (baseline) landscape character and visual context of the site and its setting within the LVA, which, for the sake of brevity, has not been repeated here;
- Undertaken an appraisal of the extent to which the site itself performs against the purposes of the Green Belt at **Section 3** with reference to **Appendix EDP 2**. This has been undertaken by a qualified Landscape Architect and follows a bespoke methodology and assessment criteria prepared by EDP (see **Appendix EDP 3**);
- Undertaken a review of the findings of the published Tunbridge Wells Borough Green Belt Strategic Study 2016 and Tunbridge Wells Green Belt Study (Stage Two) 2017 in relation to the site, at **Section 3**; and
- Reached overall conclusions in **Section 4**.

Methodology

- 1.8 EDP have developed a methodology for Green Belt Assessment that is based on landscape and visual assessment methodology as relevant to the purposes of the Green Belt, as set out in *National Planning Policy Framework (NPPF) 2018 Paragraph 133* (and included in **Section 3** below), and our experience of Green Belt reviews.
- 1.9 For each NPPF purpose, criteria have been determined that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose are described in detail and listed in **Appendix EDP 3**.
- 1.10 The grading of overall scores reflect the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt, or retained within it.
- 1.11 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the Green Belt, however, commentary is provided to give an indication of how the land could deliver development or associated benefits.

Section 2

Policy Context and Considerations

National Policy

2.1 The NPPF July 2018 states at Paragraph 133 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.”

2.2 The NPPF (Paragraph 134) states that Green Belt serves 5 purposes:

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

Local Level Considerations

Tunbridge Wells Borough Green Belt Strategic Study 2016 and Tunbridge Wells Green Belt Study (Stage Two) 2017

2.3 In order to inform the new local plan and in recognition of the need to provide housing in the Borough, Tunbridge Wells Borough Council commissioned a Green Belt Strategic Study in November 2016 (TWGBSS), which was prepared by LUC. The study aimed to strategically assess the Green Belt within the Borough of Tunbridge Wells in the context of the wider Metropolitan Green Belt. This study informed the findings of the more detailed Tunbridge Wells Green Belt Study (TWGBS), Stage Two, which was prepared by LUC in July 2017. Collectively they will both be referenced as the ‘study’.

2.4 The TWGBS has assessed land within Tunbridge Wells borough in relation to its contribution to the five Green Belt purposes, as listed in the NPPF Paragraph 134, as detailed above.

2.5 The site forms a part of Green Belt parcel TW5, both the boundaries and a summary of the assessment are included as **Appendix EDP 4**. A Key Stage Two consideration of this parcel is the *“relationship between settlement and countryside and role in gap between Tunbridge Wells and Pembury, with reference to barrier role of A21.”*

2.6 The study scores the land parcels in relation to their contribution to the five Green Belt purposes to derive a 5-point scale: weak or no contribution; relatively weak; moderate; relatively strong; and strong. A summary of findings from the TWGBS assessment is listed below within **Table EDP 2.1**, where parcel TW5 has been assessed in relation to its contribution to each Green Belt purpose.

Table EDP 2.1: Summary of TWGBS assessment of Green Belt Parcel TW5

NPPF Paragraph 134 Purpose	Comments	Score: Parcel TW5
Purpose 1: To check the unrestricted sprawl of large built-up areas	The parcel is adjacent to the large built-up area and relates more strongly to this than to the wider countryside.	Relatively Weak
Purpose 2: To prevent neighbouring towns merging into one another	Development of this parcel would leave only a very narrow physical gap, but the A21 and A264, and associated tree cover, would preserve a sense of separation.	Relatively Strong
Purpose 3: To assist in safeguarding the countryside from encroachment	The parcel has a degree of separation from both the settlement and the wider countryside.	Moderate
Purpose 4: To preserve the setting and special character of historic towns	The parcel forms a minor element in the historic setting of Tunbridge Wells.	Relatively Weak
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Individual parcels are considered to make an equal contribution to this purpose and so have not been assessed.	Not Assessed
Overall Harm Rating (Performance)		High

2.7 The assessment deems the level of harm caused by the release of the parcel TW5 as high, illustrated in **Appendix EDP 5**. Within their methodology, as the parcel is defined as making “a relatively strong contribution to one or more Green Belt purposes. No strong contribution to any purpose.”.

2.8 The TWGBS Appendix A provides an assessment summary for parcel TW5, which contains the following text of relevance here:

“Small fields defined by lines of mature trees, together with several small woodland blocks, formerly parkland associated with Pembury Grange, a Grade II listed mid-19th century house on the edge of what is now the Sandown Park estate. There is no development within the parcel aside from some small-scale horticulture set within a block of trees in the north-western corner.”

2.9 The parcel boundaries are also detailed within the study as follows:

“The western edge of the parcel abuts the Limits to Built Development at the Sandown Park estate.

The outer edges of the parcel are formed by the A264 Pembury Road to the south, the A21 to the east and Blackhurst Lane to the north. Robingate Wood forms a strong edge to the north, the A21 is set within trees and has woodland beyond it, and the tree-lined Pembury Road follows a ridge crest, beyond which several large houses sit within well-treed surrounds.”

- 2.10 The TWGBS describes the relationship between the settlement of Tunbridge Wells and the countryside as follows:

“Existing development in the adjacent Sandown Park estate occupies flat, high ground, so there is a topographical distinction between this and the parcel, which forms the head of a valley, and its well-treed character also creates some separation. However the parcel is in turn contained from the wider countryside by main roads and trees. The parcel forms the major part of the narrow gap between Tunbridge Wells and Pembury. The A21 and its containing tree cover, which prevents any intervisibility between the two settlements, is a key element in settlement separation, but the small size of the gap and the connection provided by the A264 mean that the open space within the parcel also makes an important contribution to the settlement gap. The parcel retains some historic parkland characteristics but is too contained, and too distant from the historic town centre, to play a significant role in the setting of Tunbridge Wells. The large houses along the ridge crest to the south of Pembury Road are part of the Tunbridge Wells Conservation Area, but it is the valley landscape to the south of the road that contributes to their setting, rather than land within the parcel.”

- 2.11 The strength of the Green Belt boundary is described as follows:

“The existing edge is staggered around the edges of residential gardens. Tree blocks strengthen it in places, but the outer edges of the parcel, the A21 and A264, would form stronger boundaries.”

- 2.12 In addition to the assessment summary, the TWGBS makes the following statements within the main report that of relevance here:

- With regards to Purpose 1, TWGBS states:

“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.”

“Contribution: Relatively Weak”

- With regards to Purpose 2 TWGBS states:

“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.”

“Contribution: Relatively Strong”

- With regards to Purpose 3 TWGBS states:

“The term ‘countryside’ is considered to apply, to a greater or lesser degree, to all land defined as Green Belt.”

“Contribution: Moderate”

- With regards to Purpose 4 TWGBS states:

“This study defines historic towns as Royal Tunbridge Wells and Tonbridge. The parcel forms a minor element in the setting of an historic town; or forms a more major element but has limited openness”

“Contribution: Relatively Weak”

- 2.13 TWGBS focuses on parcel TW5, it should be noted that both the proposed site and the proposed western development area within it are much smaller than the parcel. Therefore, the findings of the Green Belt Assessment relating to parcel TW5 are not fully representative of the site, or the developable area, and how they contribute to Green Belt purposes. EDP has therefore undertaken a further more detailed appraisal of the extent to which the site itself, rather than the wider area of parcel TW5, performs against the purposes of the Green Belt in **Section 3**.

Section 3 Green Belt Assessment

EDP Green Belt Assessment

- 3.1 EDP has undertaken an appraisal of the extent to which the site itself, rather than the wider area of parcel TW5, performs against the purposes of the Green Belt. This has been undertaken by a qualified Landscape Architect and follows a bespoke methodology and assessment criteria prepared by EDP (see **Appendix EDP 3**) to examine the purposes in further detail.
- 3.2 The detailed findings are presented in the Detailed Green Belt Assessment within **Appendix EDP 2**. A summary of the findings in relation to each of the five purposes is provided in **Table EDP 2.3** below.

Table EDP 2.3: Summary of EDP Site-specific Green Belt Assessment

GREEN BELT Purpose (NPPF)	EDP Methodology Criteria	Site Performance
Purpose 1 To check the unrestricted sprawl of large built-up areas.	Does the site form a contiguous open buffer between the existing settlement edge and the wider countryside?	Moderate Contribution
	Does the site have a defensible boundary which can prevent sprawl?	Low Contribution
Purpose 2 To prevent neighbouring towns merging into one another.	Is the site well associated with the existing settlement edge?	Low Contribution
	Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	Low Contribution
Purpose 3 To assist in safeguarding the countryside from encroachment.	To what extent does the site represent the key characteristics of the countryside?	Low Contribution
	To what extent is the site urbanised, either by on-site or off-site features?	Low Contribution
Purpose 4 To preserve the setting and special character of historic towns.	What is the spatial and visual relationship between the site and the historic core/Conservation Area of the nearest settlement?	Moderate Contribution
Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not tested.	N/A
Overall Weighting		Low Contribution

- 3.3 EDP's assessment of the site, in relation to the main purposes of Green Belt, shows that rather than being a high functioning part of the Green Belt, the sites provides a **low contribution** to the Green Belt purposes. Further detailed analysis, which has informed these findings, has been carried out by EDP and is detailed in **Appendix EDP 2**.

Review of The Findings of The Published Green Belt Study in Relation to The Site

- 3.4 The following paragraphs summarise the detailed findings of the EDP tests and considers these in light of the findings presented by the TWGBS.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 3.5 The TWGBS deals with this purpose in terms of the urban sprawl of Tunbridge Wells, which has subsequently been classed as a large built-up area. The study outlines that extension of the Green Belt to Tunbridge Wells reflects the significant growth of the town from the 1930's and specifically references the thin gap between Tunbridge Wells and Pembury as being c.500m. Due to the short distance between the two settlements, land within the gap is also deemed to constitute a large built-up area, as any development within this gap would be associated with either Tunbridge Wells or Pembury, depending on which side of the A21 the land is situated.

- 3.6 The TWGBS states, with regards to Purpose 1, that:

"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." (Paragraph 5.7)

- 3.7 It assesses that the parcel makes a weak contribution to this green belt purpose as it *"is adjacent to the large built-up area and relates more strongly to this than to the wider countryside."*

- 3.8 EDP uses different criteria but finds agreement with this finding in relation to the development proposals as set out in **Appendix EDP 2**.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 3.9 With respect to Parcel TW5 the TWGBS states, with regards to Purpose 2, that:

"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."

- 3.10 TWGBS assesses that this parcel makes a Relatively Strong Contribution to the green belt meaning that *"development of this parcel would result in a significant narrowing of the*

physical gap between towns". However, TWGBS qualifies this definition stating that "Development of this parcel would leave only a very narrow physical gap, **but the A21 and A264, and associated tree cover, would preserve a sense of separation**" (edp emphasis added).

- 3.11 EDP agrees with the TWGBS finding that the A21, A264 and associated tree cover would preserve a sense of separation if development were to occur within the parcel.
- 3.12 However, EDP found that development within the western part of the site would not contribute to a "*significant narrowing of the physical gap between towns*" and makes only a low contribution to this Green Belt purpose.
- 3.13 The TWGBS study found that Parcel TW5 makes a relatively strong contribution in preventing the merging of Pembury and Tunbridge Wells. However, this is considering the whole of Parcel TW5, which covers the entirety of Sandown Park and the green gap between Sandown Park estate and the A21, which lies outside of the site boundary. The assessment carried out by EDP is more site-specific and assesses the contribution to Green Belt purposes based upon the Illustrative Masterplan presented in **Appendix EDP 1**. With development confined to the western part of the site there would be no reduction in the existing closest distance between Tunbridge Wells and Pembury and only a small reduction, of some 160m (approximately), if measured along Pembury Road.
- 3.14 EDP concurs with the TWGBS statement that "*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*". The study acknowledges the reduced importance of the parcel as a gap between the settlements and that therefore the developable area within the site must hold an even less importance due to its smaller size.
- 3.15 The EDP assessment found that the site is well associated with the existing settlement edge. The proposed development, across the western site area, is situated some 80m further from Pembury than the existing settlement edge and would not reduce the minimum distance between the two settlements. It is acknowledged that it would, however, result in a reduction of only 160m (approximately) if measured along Pembury Road. In addition, it is assessed that there will be only very limited perception, limited to users of the A246, of a reduction of the perceived gap between the settlements as a result of the proposals.
- 3.16 For these reasons, using TWGBS methodology, the contribution made by the western site area has been assessed as low rather than relatively strong as assessed by TWGBS for the wider parcel.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 3.17 The TWGBS states, with regards to Purpose 3, that:

*“The term ‘countryside’ is considered to apply, to a greater or lesser degree, to all land defined as Green Belt.” It assesses that the parcel makes a **moderate contribution** because “the parcel has a degree of separation from both the settlement and the wider countryside”.*

- 3.18 TWGBS states that “Existing development in the adjacent Sandown Park estate occupies flat, high ground, so there is a topographical distinction between this and the parcel, which forms the head of a valley, and its well-treed character also creates some separation.” EDP found in the LVA that the western site area is at grade with the adjacent settlement edge with the eastern site area falling away to the valley. In addition, the western site area has a visual relationship with the adjacent settlement edge. For these reasons, while it is agreed that the eastern site area has some separation from the settlement, the western area is associated with it. However, the findings of the LVA do support the finding that the parcel, and the site, is separated from the wider countryside by the A21 and A264.
- 3.19 The accompanying Landscape and Visual Appraisal (ref 3824_r005) to this Green Belt Assessment highlights that the site exhibits only one key characteristic of Landscape Character Area 14 – Pembury Forested Plateau. The characteristic mature tree belts along the site boundaries as well as the mature woodland block in the eastern part of the site, both limit intervisibility between the site and countryside.
- 3.20 The LVA has found that the site is visually contained, by vegetation and development, and physically detached, by transport routes and development, from the wider agricultural and wooded landscape to the east and south, including within the HWAONB. The site therefore has less of a relationship with this wider landscape and more of a relationship with the urban fringe of Tunbridge Wells as recognised by the Landscape Sensitivity Assessment of Countryside around Tunbridge Wells (2017), which states that:
- “... this [western] part of the sub-area is ... contained from the wider countryside by main roads and trees, which serves to strengthen its relationship with the settlement edge, so sensitivity in this respect is limited.”*
- 3.21 In addition, the noise, light, and movement from the adjacent transport routes, and adjacent development, provide urbanising influences, notably across the western end of the site, which is considered to have an urban edge character that diminishes to the east.
- 3.22 For these reasons, the contribution made by the western site area has been assessed as low, rather than moderate as assessed by TWGBS for the wider parcel.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

- 3.23 The TWGBS states, with regards to Purpose 4, that *“This study defines historic towns as Royal Tunbridge Wells and Tonbridge”*. It finds that *“the parcel forms a minor element in the historic setting of Tunbridge Wells”* and that *“the large houses along the ridge crest to the south of Pembury Road are part of the Tunbridge Wells Conservation Area, but it is the valley landscape to the south of the road that contributes to their setting, rather than land within the parcel”*.

- 3.24 EDP's Green Belt Assessment at **Appendix EDP 2** states that the site has very little visual connection with the historic setting of Tunbridge Wells. As shown in **Plan EDP G1**, the conservation area overlaps with the site frontage along Pembury Road incorporating the tree line along the site frontage only. The LVA (ref. edp3824_r004a) finds that visibility into the site here is reduced due to this vegetation, thus the site makes a very minor contribution to the character of this route.
- 3.25 For these reasons, the contribution made by the western site area has been assessed as low and is therefore aligned with the findings of the TWGBS.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

- 3.26 Both TWGBS and EDP considered the test against purpose five of the Green Belt to be beyond the scope of their assessments.

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Section 4

Conclusion of Green Belt Review

- 4.1. EDP has been commissioned by Gleeson Strategic Land to undertake a Green Belt Assessment that examines the performance of the site against the purposes of the Green Belt surrounding Tunbridge Wells, as illustrated on **Appendix EDP 1**. Tunbridge Wells Borough Council have undertaken two separate Green Belt studies relating to the site, with the second study (stage two) being more detailed and parcel specific, see **Appendices EDP 4** and **5**.
- 4.2. The second study, TWGBS, identified the site as forming a small part of parcel TW5 and tested the contribution of this parcel to the purposes of the Green Belt as listed in the NPPF, Paragraph 134. The TWGBS finds that the potential level of harm associated with the release of the parcel for development would be high. This is defined within their methodology as the parcel *“makes a relatively strong contribution to one or more Green Belt purposes. No strong contribution to any purpose”*.
- 4.3. Consequently, using their own methodology, EDP has conducted a site-specific Detailed Green Belt Assessment of the extent to which the site performs against the purposes of the Green Belt, as listed in the NPPF, Paragraph 134. This has been undertaken by a qualified Landscape Architect and follows a bespoke methodology and assessment criteria prepared by EDP (see **Appendix EDP 3**) to examine the purposes in further detail.
- 4.4. With the site being significantly smaller than the TWGBS parcel TW5, and the developable area being smaller still, the contribution towards the green belt purposes is considered likely to be significantly reduced.
- 4.5. The Green Belt Assessment concludes the site provides a **low contribution** to Green Belt purposes, less than the findings of a High contribution for the wider parcel. This is primarily due to the site representing a smaller area than parcel TW5 and the fact that the proposed development area relates more closely to the settlement edge than to the wider area of the parcel.
- 4.6. This Green Belt Assessment finds that development can occur in this location without compromising the fundamental aims of the NPPF to keeping land permanently open and while continuing to serve the 5 purposes of Green Belt at this eastern edge of Tunbridge Wells; primarily to check the unrestricted sprawl, prevent merging of settlements, safeguard the countryside from encroachment, and preserve the setting and special character of historic towns.
- 4.7. This finding is due, primarily, to the relatively limited proportion of the existing gap between settlements that the site represents, the distinct relationship between the site and Tunbridge Wells, the limited intervisibility between the site and Pembury to the east, and the comparatively effective defensible edge that the site would provide. The Illustrative

Masterplan (see **Appendix EDP 1**) shows development limited to the western site area, so further reducing the proportion of the Green Belt represented by these proposals.

- 4.8. By virtue of the site's defensible boundaries, which reduce the visual and physical association between the site and the immediate context, its removal from the Green Belt would not undermine the integrity of the Green Belt beyond.

- 4.9. It is considered that the site could reasonably be removed from the Green Belt and developed in accordance with the principles of the Illustrative Masterplan (as detailed in **Appendix EDP 2**) without harm to the integrity of the Green Belt overall and with potential benefits in terms of creation of an attractive, integrated settlement edge and a defensible Green Belt boundary.

Appendix EDP 1 Illustrative Masterplan

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Site
Land at Sandown Park, North of Pembury Road, Tunbridge Wells

Drawing
Illustrative masterplan

Date 23.04.19 Scale 1:1000@A3 Drawing ref: 1232/02

Appendix EDP 2 Detailed Green Belt Assessment

Description of the Site

The site lies at the eastern edge of Tunbridge Wells, with Pembury beyond the A21 to the east. The site broadly comprises a square field, down to rough grassland with areas of scrub across the western third, and the eastern two-thirds comprise areas of rough grassland and woodland, divided by fencing into some four compartments. The western field, noted as the developable area of the site, is broadly level with gentle undulations and is enclosed by mature tree growth and boundary vegetation.

The eastern area of the site is divided by a dry valley, running south-west to north-east, and marked by a row of mature trees. To the north of the valley is a small area of rough grassland with a south-easterly aspect, and to the south the land has a north-westerly aspect with rough grassland to the west and woodland to the east. At the north-eastern extent the land is low lying and very enclosed with little visual connectivity to the rest of the site. The topography, mature trees and woodland across the eastern site area provide enclosure and reduce the influences of surrounding land uses, with the exception of noise from the adjacent roads, mainly the A21 and Pembury Road.

The sites western boundary consists of mature trees with a dense understorey comprising partly hedgerow and scrub. The north-west corner of the site lacks any established boundary vegetation resulting in views of adjacent housing off Tree Lane.

The sites northern boundary consists of mature tree growth and a dense understorey of scrub that is disjoined in parts resulting in views of a secluded residential property off an unnamed road (a private road off Sandown Park) and two residential properties off Pembury Grange.

The rough grassland, areas of scrub, and fallen trees within the woodland, all create an air of neglect across the site. The noise, light and movement from the adjacent transport routes, and adjacent development, provide urbanising influences, notably across the western end of the site, which erodes the quality of the landscape. The site is visually and physically detached, by transport routes, development and woodland, from the wider agricultural and wooded landscape to the east and south, including within the High Weald AONB. The site has less of a relationship with this wider landscape and more of a relationship, notably across its western end, with the urban fringe of Tunbridge Wells. For all these reasons the site is considered to have an urban edge character.

Furthermore, the sites enclosed character is a result of the mature tree lines and woodland within the eastern areas of the site. This sense of enclosure is very apparent as the site is well contained and the mature vegetation both within and along its boundaries restrict any intervisibility with the wider landscape, particularly the High Weald AONB.

With regard to visual matters, as set out in the Landscape and Visual Appraisal (ref. edp3824_r001), due to the presence of mature vegetation along the boundaries of, and through, the site, in combination with the topography and adjacent settlement of Tunbridge Wells, the site is not visible from the wider landscape.

Principal visual receptors in publicly accessible locations would be limited to road users and pedestrians along Pembury Road (A264), which runs along the southern site boundary. There may be very limited views available from the north of the site along the track off Sandown Park and by residents of the few select properties proximal to the northern, western and southern boundaries. It should also be noted that there is no potential for visibility from the south within the High Weald AONB. Whilst visibility here is extremely limited there is sensitivity here due, in part, to the location of the site within the Metropolitan Green Belt.

Purpose 1: To check the unrestricted sprawl of large built-up areas		
Application of Criteria	Assessment	Score
<p><i>Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/ wider countryside?</i></p>	<p>The site is fully within the Green Belt and contains no built development; it forms a small part of a buffer between Tunbridge Wells and Pembury.</p> <p>However, the site lies adjacent to the eastern edge of Tunbridge Wells and adjacent to Pembury Road (A264), to the south, and the A21 slip road (Figure EDP A2.1) to the east. Properties along Tree Lane and Pembury Grange are visible from within the site beyond the western and northern boundaries. Visible properties adjacent to the site, the noise, and to a lesser extent, movement and light from the adjacent A roads, extend the urban character of Tunbridge Wells across the site, notably at its western end and along the southern site frontage where the urbanising influences from the A264 are felt considerably. See Figures EDP A2.2 and A2.3.</p> <p>It should also be noted that visibility into the site from the A246 is limited to glimpsed, oblique, filtered views into the western end of the site. Views into the eastern site area are more limited due to the wider woodland belt here. Where these views do exist, they are predominantly limited by vegetation along the northern site boundary and settlement beyond, with residential development apparent in the view. The contribution of the site itself to perception of an open gap between Tunbridge Wells and Pembury is very limited beyond the contribution made by the vegetation along the southern site boundary.</p> <p>It should also be noted that there is development to the south of the A246 where it runs adjacent to the south, this comprises Oakley School and The Coach House with its associated buildings and grounds. This development is set back beyond a tree belt lining the road and so there is limited perception of its existence from the road except for at its entrance. The relatively hidden nature of this development is enough to allow the Landscape Sensitivity Assessment of Countryside around Tunbridge Wells (2017) and Conservation Area Character appraisals to claim that this is a green break.</p> <p>It can be concluded that there is an absence of development within the site but that its undeveloped nature is compromised to some extent by adjacent and nearby development apparent across the site. In addition, the gap between Tunbridge Wells and Pembury, to which the site contributes to the north of the A246, is compromised by development to the south of this road. However, it is accepted that due to the screening of this development from the A246 it does not detract from the perception of the gap between the settlements.</p>	<p>Moderate Contribution</p>



Figure EDP A2.1: Eastern site boundary (across centre of image). The A21 lies the other side of the densely treed eastern site boundary.



Figure EDP A2.2: Gaps in the northern site boundary showing visible adjacent properties within the existing built up area of Tunbridge Wells.



Figure EDP A2.3: Looking south-west along Pembury Road. Showing the urbanising influences of Pembury Road (A264), notably the traffic noise and movement, overlooking properties and lighting columns.

Application of Criteria	Assessment	Score
<p><i>Are there any defensible boundaries?</i></p>	<p>Visually, the site is generally well contained within the wider landscape by:</p> <ul style="list-style-type: none"> • To the west – mature tree field boundary that also generally provides an eastern boundary for residential development at the existing settlement edge to the west of the site; • To the east – mature woodland block and tree belts along the A21 (Figure EDP A2.1); • To the south – the tree belt along the A264 (Pembury Road) (Figure EDP A2.3); and • To the north the site is enclosed by an agricultural fence with intermittent vegetation allowing intermittent views beyond. <p>Of these boundaries the strongest, providing a visual and physical barrier between the site and the wider area, are the A21 and the A246.</p> <p>Within the site there is a clear divide between the character of the western and eastern site areas with the western area associated with the adjacent development that is at grade with it, and the eastern area more closely associated with the open parkland to the north and the woodland along the A21 to the east. In addition, as the Illustrative Masterplan shows, a sensitive approach to the eastern development edge, with indentation and additional planting, together with the retention of the eastern site area as informal, naturalistic, open space, could build on this to create an attractive, defensible settlement edge.</p>	<p>Low Contribution</p>

It can be concluded that the site provides the opportunity to build on existing landscape character and features to provide an attractive, defensible settlement boundary that makes a positive contribution to the settlement edge.

Purpose 2: To prevent neighbouring towns merging into one another



Figure EDP A2.4: Taken from the National Trail 'Tunbridge Wells Circular Walk', within the High Weald AONB, looking north-east. Both the site and settlement of Tunbridge Wells are surrounded by mature woodland blocks to the south. Glimpsed views of Pepenbury Hall are available where topography falls to the south. There are no views of Pembury from the wider landscape to the south of Tunbridge Wells.



Figure EDP A2.5: Taken from the Pembury Road flyover looking north over the A21 bypass. This shows the mature woodland blocks alongside the A21, which prevent intervening views between Pembury and Tunbridge Wells. The A21 acts as a clear dividing boundary line separating the two settlements.

Application of Criteria	Assessment	Score
<p><i>Is the site well associated with the existing settlement edge?</i></p>	<p>The site is physically and visually well associated with the existing settlement edge of Tunbridge Wells, being directly adjacent to, at grade with housing along Tree Lane to the west and Sandown to the north. There is intervisibility with the settlement to the west (properties along Tree Lane) and north (properties along Pembury Grange), as illustrated in Figure EDP A2.2.</p> <p>The site is not divorced from this edge and there is potential for good physical and visual integration between it and the existing edge.</p> <p>It is clear from historic map analysis that the settlement areas at the eastern extent of Tunbridge Wells, adjacent to the site and around Sandown Park, have extended significantly over the last 60 years to accommodate growth of the town. Since the 1960s, fields to the south-east of Gregg’s Wood have been the natural direction for development to accommodate the growth of Tunbridge Wells at Sandown Park. Therefore, the site forms a logical fit with the existing settlement, and would be a logical extension to Tunbridge Wells given the location of the developable area illustrated within the Masterplan.</p> <p>It can be concluded that the site is well associated with the existing settlement edge, abutting one settlement boundary, to the west, and being well associated with the settlement edge to the north.</p>	<p>Low Contribution</p>



Figure EDP A2.6: Aerial photograph showing the site in relation to Tunbridge Wells and Pembury. The developable area covers the western part of the site and is hatched blue. The orange coloured line illustrates the distance from the easternmost edge of Tunbridge Wells to Pembury, 540m. The purple coloured line illustrates the distances from the eastern edge of the developable area on site to Pembury, 620m.

<p><i>What is distance between the site and next nearest settlement edge and what is the effect of the perceived and actual intervisibility on potential for coalescence?</i></p>	<p>The western site boundary abuts properties along the existing settlement edge of Tunbridge Wells. The nearest settlement beyond the Green Belt is Pembury. Figure EDP A2.6 above shows the existing distance between Tunbridge Wells and Pembury in orange, some 540m, and the distance from the proposed development, across the western site area, and Pembury in purple, some 620m.</p> <p>The proposed development is situated some 80m further from Pembury than the existing settlement edge, the proposed development within the western area would not reduce the current distance between the two settlements. It would result in a reduction of only 160m if measured along Pembury Road.</p> <p>The approximate distances from localities within Tunbridge Wells to the nearest settlement are given below:</p> <ul style="list-style-type: none"> • Existing development at the easternmost point of Sandown Park estate – 540m. This point will remain the easternmost point of the built-up area within Tunbridge Wells; and • Eastern edge of site’s developable area – 620m. The site will not reduce the distance between Tunbridge Wells and Pembury. 	<p>Low Contribution</p>
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	<p>This illustrates that development of the site in accordance with the Illustrative Masterplan would not further reduce the existing gap between the easternmost point of Tunbridge Wells and Pembury. As such, the site forms only a limited part of the open buffer between Tunbridge Wells and Pembury and the area proposed for development on the illustrative Masterplan represents a smaller proportion still.</p> <p>There is no intervisibility between Tunbridge Wells and Pembury, or between the site and Pembury. This is primarily due to the screening effect of intervening topography and mature vegetation across the eastern site area, at, and beyond, the site boundaries (shown in Figure A2.5), as described above and acknowledge within published landscape character assessments. Consequentially development within the western part of the site will not change the existing visual connection between the settlements.</p> <p>Figure A2.4 illustrates how local topography and mature woodland restrict views of both Tunbridge Wells and Pembury from the wider landscape. As a consequence, there will be no perception of reduction in distance between the two settlements from the wider landscape as a result of implementation of the proposals.</p> <p>Another consideration regarding the perception of a gap between the two settlements is the perception of users of the A246 travelling between Tunbridge Wells and Pembury. As noted above, visibility into the site from the A246 is limited to glimpsed, oblique, filtered views into the western end of the site. Views into the eastern site area are more limited due to the wider woodland bet here. Where these views do exist, they are predominantly limited by vegetation along the northern site boundary and settlement beyond with residential development apparent in the view. The primary contribution of the site itself to perception of a green gap between Tunbridge Wells and Pembury is the vegetation along the southern site boundary.</p> <p>The Illustrative Masterplan shows that proposed development, and the new access, is restricted to the western end of the site which already has development influences. It also shows vegetation along the southern boundary as being retained and enhanced so further restricting visibility into the site. In addition, an area of open space is proposed at the site entrance to limit visibility to development through the entrance.</p> <p>For these reasons it is assessed that there will be only very limited perception, limited to users of the A246, of a reduction of the perceived gap between the settlements as a result of the proposals.</p>	
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Purpose 3: To assist in safeguarding the countryside from encroachment		
Application of Criteria	Assessment	Score
<i>How representative is the site of the key characteristics of the countryside?</i>	<p>Documented landscape character is reviewed within the Landscape and Visual Appraisal (ref. edp3824_r005). The Tunbridge Wells Borough Landscape Character Assessment places the site within Landscape Character Type, 'Forested Plateau', and Landscape Character Area (LCA) '14: Pembury Forested Plateau'. Generally, the description of the LCA is representative of the wider site context; although there are also urban influences due to the site adjoining the settlement of Tunbridge Wells, which suggest a peri-urban setting and character notably across the western site area.</p> <p>The key characteristic of the LCA of most relevance to the site itself is: extensive woodland and forest cover dominates and tends to conceal local topographic variations and limits views both within the area and beyond. This is observed through the mature tree belts along the site boundaries as well as the mature woodland block in the eastern part of the site.</p> <p>The main characteristics of the site that differ from the key characteristics of the LCA are in relation to tranquillity and rural character, notably across the western site area. The 'sense of remoteness' and 'secretive character' identified within the LCA are lessened across this area of the site when compared to the wider LCA due to: the proximity of the settlement edge which results in intervisibility with properties across 3 out of the 4 site boundaries.</p> <p>These characteristics are tarnished further due to the visible presence of housing, the audible presence of the proximal A21 bypass and both the audible and visible presence of the A264 (Pembury Road). This means that its primary visual connections are with the settlement edge and Pembury Road. This proximity and intervisibility diminish both the sense of remoteness and secretive character of this site area in comparison to that of the wider LCA.</p> <p>It can be concluded that the site has a medium to low representation of characteristics and many landscape detractors.</p>	Low Contribution
<i>What is the influence of urbanising features?</i>	<p>The site, and notably the western site area, relates physically and visually with Tunbridge Wells due to its proximity to the settlement edge and subsequently, the intervisibility with surrounding adjacent properties and roads. In addition, the site is physically and visually divorced from the wider countryside by the A21 and A246.</p> <p>The site, notably across its western area and along the southern boundary, is urbanised by intervisibility with the settlement edge, and also by the following features:</p>	Low Contribution

	<ul style="list-style-type: none"> • The recent (within the last 60 years) adjacent development within Sandown Park; notably along Tree Lane and Pembury Grange, and the infrastructure associated with this; • The lighting columns, road infrastructure, damaged closeboard fences and other detracting features along the southern boundary; and • The subsequent noise and visual impact of traffic along the A264 (Pembury Road) and A21 bypass. <p>It can be concluded that there are many off-site urbanising features affecting the site.</p>	
Purpose 4: To preserve the setting and special character of historic towns		
Application of Criteria	Assessment	Score
<i>Is there potential for intervisibility with an historic core?</i>	<p>The nearest CA is Royal Tunbridge Wells, which extends along Pembury road from the core of the settlement. The southern site boundary lies within the CA. However, intervisibility with the core of the CA is non-existent due to the sites distance from the core, the curvature of Pembury Road, enclosing roadside tree belts and level topography along Pembury Road.</p> <p>Visibility towards the site, from the core of the CA within Tunbridge Wells, is limited by the generally close-knit nature of development along Pembury Road along with the lining tree belts. There is no intervisibility with the CA of Pembury as the settlement is not visible from the site due to mature vegetation along the A21 and surrounding woodland (shown in Figure A2.5).</p> <p>It can be concluded that the site is adjacent to an historic character area/heritage-related designation however it does not have significant intervisibility with the historic core of the CA.</p>	Moderate Contribution
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
Application of Criteria	Assessment	Score
<i>Is the site within the Green Belt, and therefore not representative of derelict or other urban land?</i>	Not tested.	N/A
Overall Weight		Low Contribution

Appendix EDP 3

Green Belt Assessment Methodology and Criteria

Review Criteria

- A3.1 As noted in the NPPF, Paragraph 134, the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allow for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose is described in more detail below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- A3.2 This is a test that considers whether the site is able to prohibit sprawl. Commonly sprawl is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.
- A3.3 Sprawl may also be discouraged by defensible boundaries to existing settlements that are either natural (e.g. topography, woodland or water course) or man-made features (e.g. as a main road, main railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries may contribute towards greater openness.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- A3.4 The consideration is whether or not the settlement growth could lead to merging with another town. The wording of the NPPF refers to 'towns', but often the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges to distinct settlement areas that might be defined as towns.
- A3.5 In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.
- A3.6 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on distance between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- A3.7 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space and access to it, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks, properties, mineral extraction or larger areas of settlement.
- A3.8 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the visual context as described above in **Section 2**. Consideration is also given to the extent of recreational access provided to the Green Belt through the site.
- A3.9 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.
- A3.10 The matter of 'encroachment' is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, sub-stations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A3.11 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A3.12 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded where possible or integrated sensitively into design proposals.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

A3.13 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the Archaeology and Heritage Assessment allows the assessment to acknowledge that historic cores do exist as indicated by the Royal Tunbridge Wells and Pembury Conservation Areas.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

A3.14 This purpose falls outside the scope of this report and has not been tested.

Review Scoring

A3.15 EDP has developed a methodology for Green Belt Reviews, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.

A3.16 The site is scored against the criteria for each purpose as shown below, with criteria weighted as no, low, moderate or strong contribution towards meeting the purposes of the Green Belt. Occasionally, scores are spread if part of the site makes differing performances. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt, or retained within it.

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<p>NPPF Paragraph 134 Green Belt Purpose</p>	<p>Criteria</p>	<p>Application of Criteria to Site and Criteria Weighting:</p> <ul style="list-style-type: none"> • No Contribution; • Low Contribution; • Medium Contribution; • Strong Contribution.
<p>Purpose 1 To check the unrestricted sprawl of large built-up areas</p>	<ul style="list-style-type: none"> • Creates a clear, recognisable distinction between urban fringe and open countryside. 	<p>Does the site form an open buffer between the existing settlement edge and the wider countryside?</p> <ol style="list-style-type: none"> a. Yes, the site is free of development and associated influences and strongly contributes to the openness of the Green Belt (Strong); b. There is an absence of development within the site, but it is overlooked by adjacent/nearby development (Moderate); c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (Low); and d. Land use of the site results in it forming neither countryside or urban (no contribution).

NPPF Paragraph 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: <ul style="list-style-type: none"> • No Contribution; • Low Contribution; • Medium Contribution; • Strong Contribution.
	<ul style="list-style-type: none"> • Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary. • Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries. Incomplete or low boundaries may result in part/all of a site making a greater contribution to the openness of the Green Belt. 	<p>Does the site have a defensible boundary which can prevent sprawl?</p> <ul style="list-style-type: none"> a. The site does not have defensible boundaries and maintains openness with the wider Green Belt (strong); b. The site has some defensible boundary/boundaries and maintains openness in some directions. Additional reinforcement needed (Moderate); c. The site has some permanent boundaries such as roads/railways/rivers/high ground and partially defensible boundaries, some of which do not require additional reinforcement (Low); and d. The site has permanent defensible boundaries that would immediately prevent sprawl (no contribution).
Purpose 2 To prevent neighbouring towns merging into one another	<ul style="list-style-type: none"> • Settlements maintain a recognisable edge. • The extent to which the site forms a logical fit with the settlement or, is perceived as an extension that could erode openness. 	<p>Is the site well associated with the existing settlement edge?</p> <ul style="list-style-type: none"> a. The site forms the gap between two settlement edges (strong); b. The site abuts two settlement boundaries and therefore forms part of an indent (moderate); c. The site abuts one settlement boundary but is not divorced from it (low); and d. The site is clearly separated from the settlement boundary and would not undermine the sense of openness (no contribution).

<p>NPPF Paragraph 134 Green Belt Purpose</p>	<p>Criteria</p>	<p>Application of Criteria to Site and Criteria Weighting:</p> <ul style="list-style-type: none"> • No Contribution; • Low Contribution; • Medium Contribution; • Strong Contribution. <p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence?</p> <ol style="list-style-type: none"> a. Immediate and clear intervisibility with next nearest settlement edge (strong); b. Partial intervisibility with next nearest settlement edges (moderate); c. Limited intervisibility with next nearest settlement edges (low); and d. No intervisibility with next nearest settlement edges (no contribution).
<p>Purpose 3 To assist in safeguarding the countryside from encroachment</p>	<ul style="list-style-type: none"> • Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography. A larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap. • The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging. 	<p>To what extent does the site represent the key characteristics of the countryside?</p> <ol style="list-style-type: none"> a. The site is highly representative of host landscape character area/type; does not contain landscape detractors (strong); b. The site is partially representative of host landscape character area/type; there are some landscape detractors (moderate); c. The site has a low representation of characteristics; many landscape detractors (low); and d. No representation of landscape character area/type; high number detractors that weaken landscape character considerably (no contribution).
	<ul style="list-style-type: none"> • The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically. 	

<p>NPPF Paragraph 134 Green Belt Purpose</p>	<p>Criteria</p>	<p>Application of Criteria to Site and Criteria Weighting:</p> <ul style="list-style-type: none"> • No Contribution; • Low Contribution; • Medium Contribution; • Strong Contribution.
<p>Purpose 4 To preserve the setting and special character of historic towns</p>	<ul style="list-style-type: none"> • Enclorachment: features such as settlement edge, speed signage and street lighting affect the extent to which the countryside changes from rural to urban. 	<p>To what extent is the site urbanised, either by on-site or off-site features?</p> <ol style="list-style-type: none"> a. There are no urbanising features within the site or directly influencing it (strong); b. There are several off-site urbanising features affecting the site (moderate); c. There are many off-site urbanising features affecting the site (low); and d. The site is distinct due to its urbanising features (no contribution).
<p>Purpose 4 To preserve the setting and special character of historic towns</p>	<ul style="list-style-type: none"> • The proximity of the site to a heritage designation relates to the historic character of a settlement and whether or not its openness in Green Belt terms is a consideration. 	<p>What is the spatial and visual relationship between the site and the historic core of the nearest towns?</p> <ol style="list-style-type: none"> a. The site is wholly within an historic character area/heritage-related designation (strong); b. The site is adjacent to an historic character area/heritage-related designation (moderate); c. The site has partial indivisibility with an historic character area/heritage-related designation its openness may be a consideration (low); and d. The site does not share a boundary with an historic character area/heritage-related designation and/or there is no indivisibility (no contribution).

NPPF Paragraph 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: <ul style="list-style-type: none"> • No Contribution; • Low Contribution; • Medium Contribution; • Strong Contribution.
Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not tested.	Not tested.

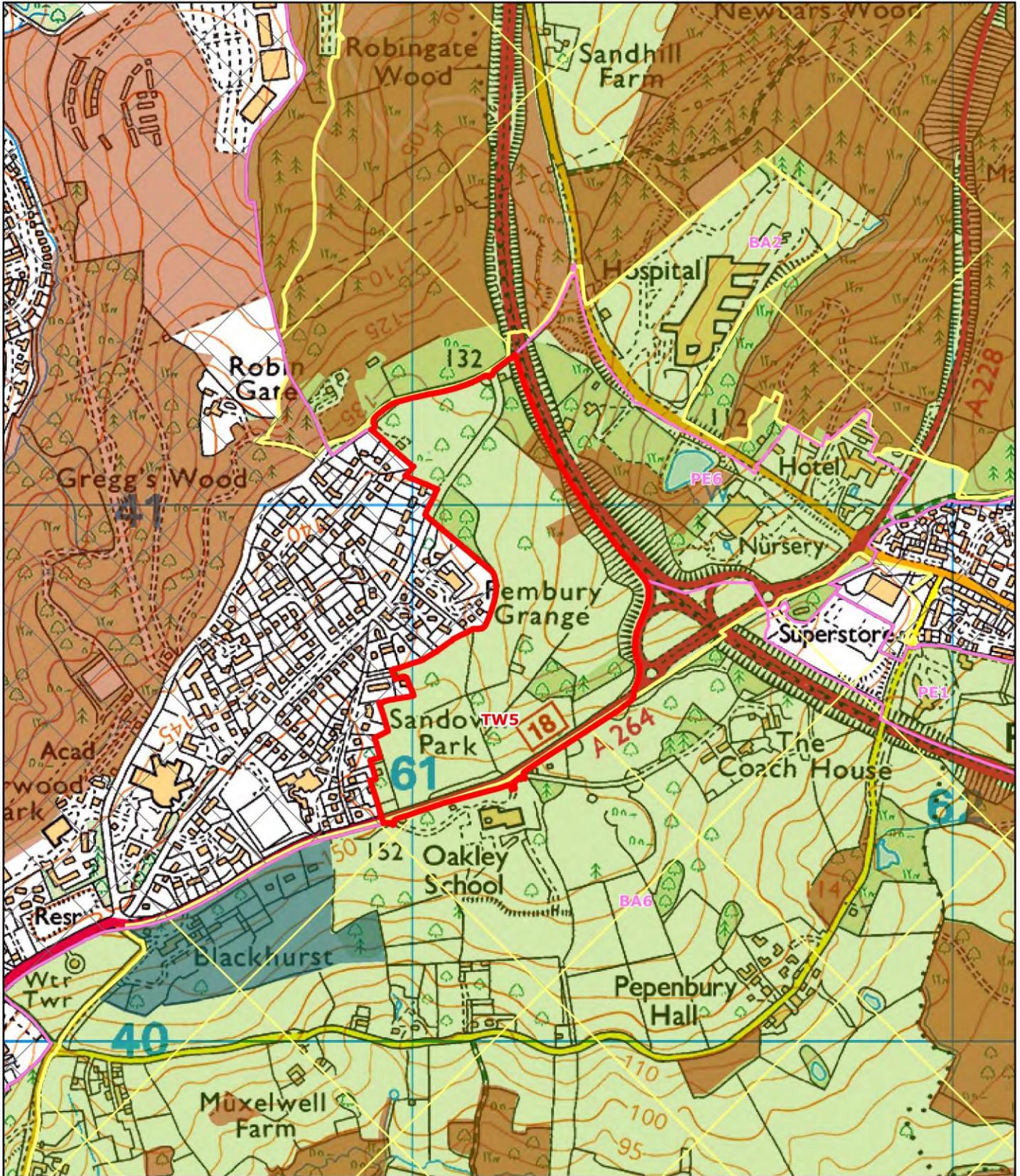
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Appendix EDP 4
Extract from Tunbridge Wells Green Belt Study 2017 – Parcel TW5

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Settlement: Tunbridge Wells Settlement Type: Town

Parcel: TW5



- | | | |
|---|---|--|
|  Assessment Parcel |  Limits to Built Development | Natural Constraints |
|  Other Assessment Parcels |  AONB |  SAC, SPA, SSSI, Nature Reserves, Local Wildlife Sites |
|  District Boundary | |  Ancient Woodland Inventory and Floodzones 2 & 3 |
|  Green Belt | | Cultural Constraints |
|  Contour | |  Historic Parks and Gardens, Proposed Historic Parks and Gardens, and Scheduled Monuments |

Settlement:	Tunbridge Wells	Settlement Type:	Town
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Parcel	TW5
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Size (ha)	24.7	Parcel type	Green Belt Parcel
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Development/land use

Small fields defined by lines of mature trees, together with several small woodland blocks, formerly parkland associated with Pembury Grange, a Grade II listed mid-19th century house on the edge of what is now the Sandown Park estate. There is no development within the parcel aside from some small-scale horticulture set within a block of trees in the north-western corner.

Parcel boundaries

The western edge of the parcel abuts the Limits to Built Development at the Sandown Park estate. The outer edges of the parcel are formed by the A264 Pembury Road to the south, the A21 to the east and Blackhurst Lane to the north. Robingate Wood forms a strong edge to the north, the A21 is set within trees and has woodland beyond it, and the tree-lined Pembury Road follows a ridge crest, beyond which several large houses sit within well-treed surrounds.

Relationship between settlement and countryside

Existing development in the adjacent Sandown Park estate occupies flat, high ground, so there is a topographical distinction between this and the parcel, which forms the head of a valley, and its well-treed character also creates some separation. However the parcel is in turn contained from the wider countryside by main roads and trees. The parcel forms the major part of the narrow gap between Tunbridge Wells and Pembury. The A21 and its containing tree cover, which prevents any intervisibility between the two settlements, is a key element in settlement separation, but the small size of the gap and the connection provided by the A264 mean that the open space within the parcel also makes an important contribution to the settlement gap. The parcel retains some historic parkland characteristics but is too contained, and too distant from the historic town centre, to play a significant role in the setting of Tunbridge Wells. The large houses along the ridge crest to the south of Pembury Road are part of the Tunbridge Wells Conservation Area, but it is the valley landscape to the south of the road that contributes to their setting, rather than land within the parcel.

Contribution to Green Belt purposes

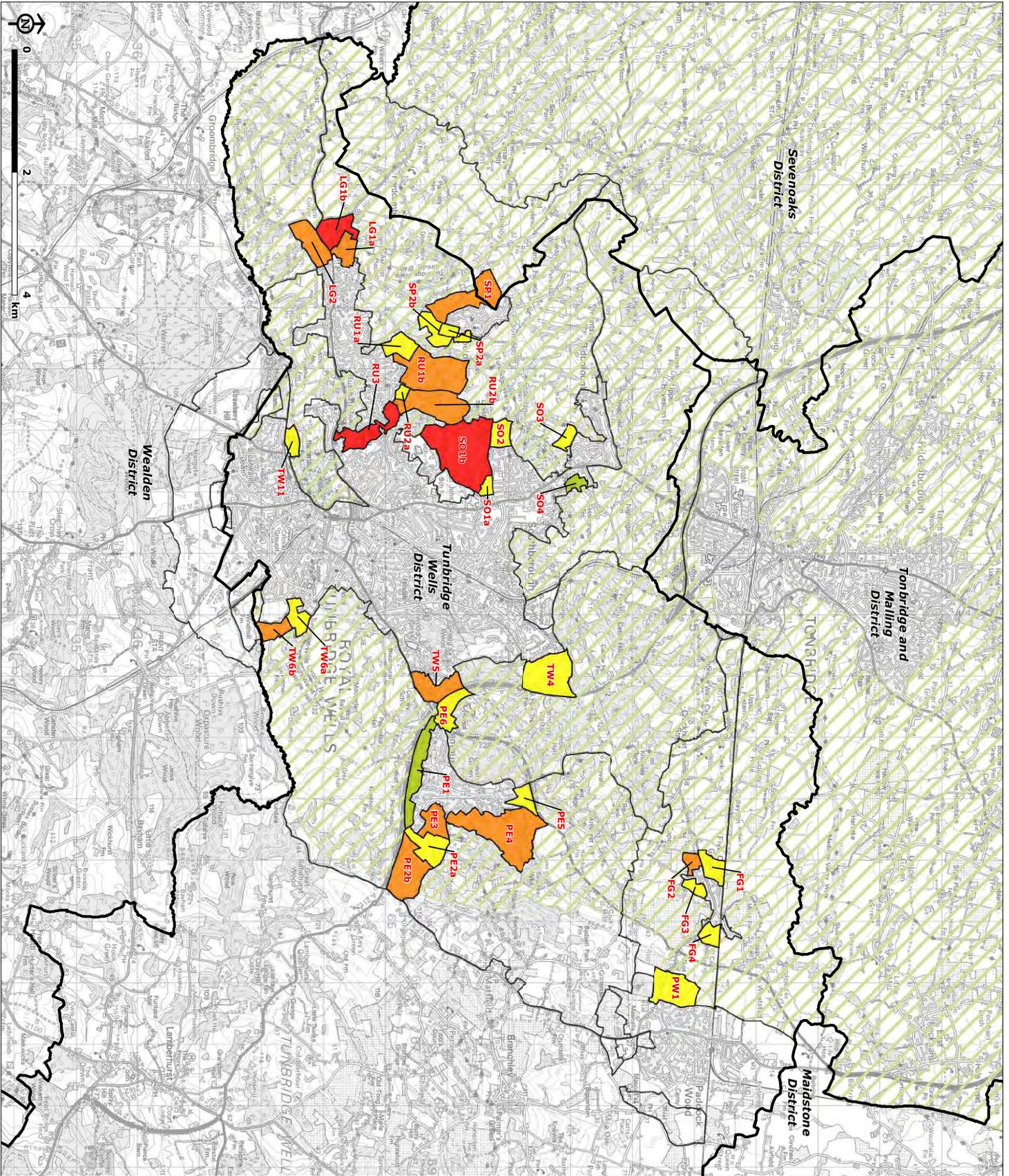
Purpose	Comments	Rating
1 - Check the unrestricted sprawl of large built-up areas	The parcel is adjacent to the large built-up area and relates more strongly to this than to the wider countryside.	Relatively weak
2 - Prevent neighbouring towns merging into one another	Development of this parcel would leave only a very narrow physical gap, but the A21 and A264, and associated tree cover, would preserve a sense of separation.	Relatively strong
3 - Assist in safeguarding the countryside from encroachment	The parcel has a degree of separation from both the settlement and the wider countryside.	Moderate
4 - To preserve the special character of historic towns	The parcel forms a minor element in the historic setting of Tunbridge Wells.	Relatively weak
5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land	Individual parcels are considered to make an equal contribution to this purpose and so have not been assessed.	Not assessed

Green Belt boundary strength

The existing edge is staggered around the edges of residential gardens. Tree blocks strengthen it in places, but the outer edges of the parcel, the A21 and A264, would form stronger boundaries.

Appendix EDP 5
Extract from Tunbridge Wells Green Belt Study 2017 – Harm Indicator

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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

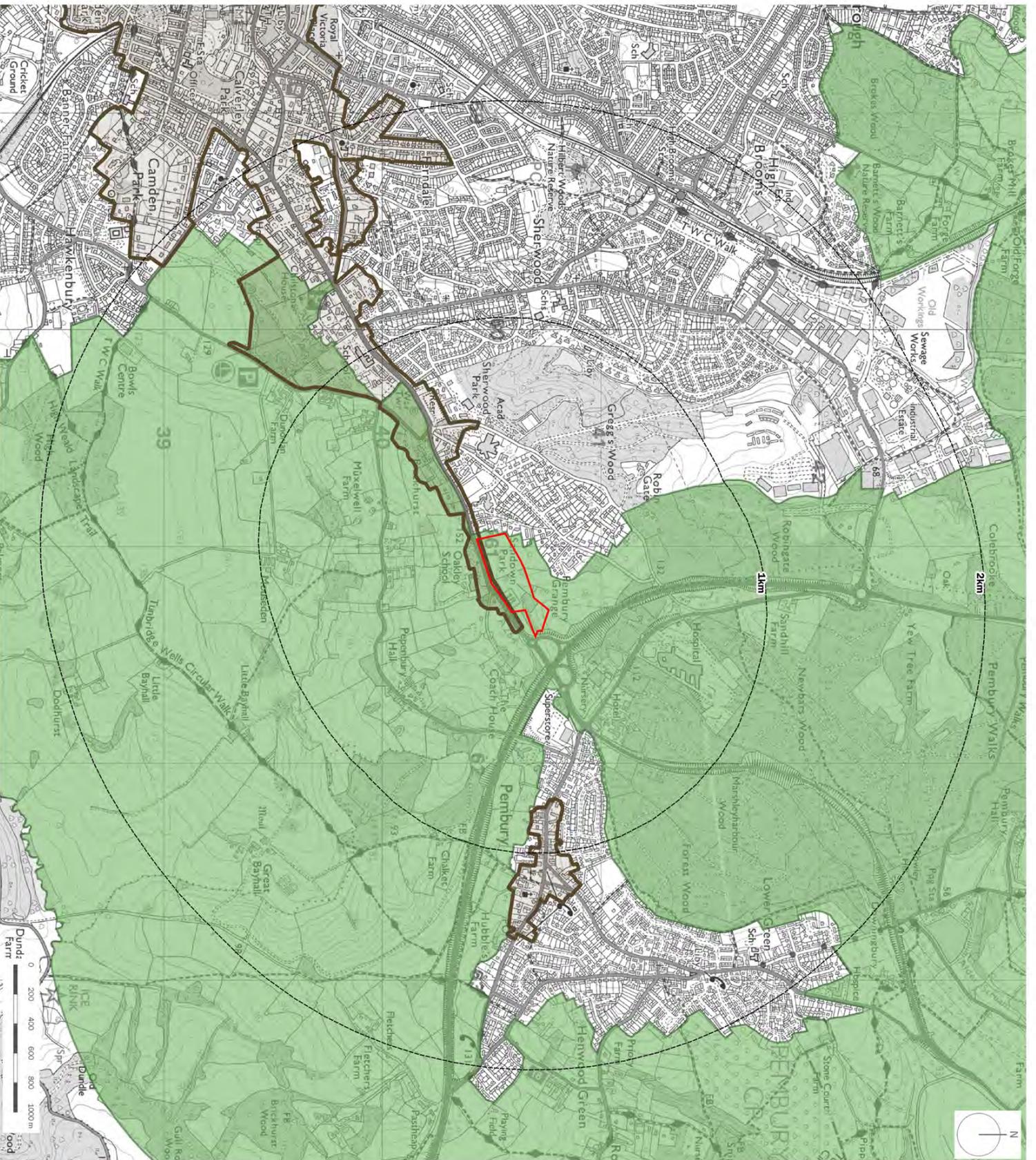
LUC

Map Scale @ A3: 1:60,000

Plan

Plan EDP G1 Environmental Planning Context
(edp3824_d014a 18 January 2019 OW/TR)

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 Site Boundary

 Range Rings (at 1km intervals)

 Green Belt

 Conservation Area

client
Gleeson Strategic Land

project title
Land at Sandown Park, North of Pembury Road, Tunbridge Wells

drawing title
Plan EDP G1: Environmental Planning Context

date	13 JANUARY 2019	drawn by	OW
drawing number	edp0201_0714a	checked	TR
scale	Refer to scale bar	QA	CR

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