

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Note Requested by the Inspector

**Local Plan Examination Note for
Inspector in response to Action Point 12
regarding the proposed changes to the
Green Belt in the Submission Local
Plan**

Document Reference: TWLP/091

Date: 26 August 2022



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1.0 Introduction

- 1.1 During the Hearing Sessions on the Tunbridge Wells Borough Local Plan, the Inspector asked the Council to prepare a number of Notes on “Action Points”, essentially to clarify its position on certain matters that were discussed.
- 1.2 This Note relates to Action Point 12 relating to the proposed changes to the Green Belt as set out within the Submission Local Plan. It follows a number of times during the hearing sessions, both in general and in relation to individual sites.
- 1.3 The Inspector suggested that it would be helpful for him and readers of the Plan to set out exactly which land is to be removed from the Green Belt as a direct result of proposed development through an allocation and, in addition, that which is to be removed or added as a consequence of an allocation. These latter “*consequential changes*” are regarded as necessary or appropriate in order to ensure that the new Green Belt boundary is rational and consistent with the NPPF paragraph 143 (f) which requires Plans to “*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*”.
- 1.4 All changes to the existing Green Belt boundary form part of the Submission Local Plan. The respective considerations are elaborated upon below, also showing the differentiation between those Green Belt areas to be de-designated specifically for allocations and those that are consequential changes beyond an allocation. A full set of plans to more clearly illustrate the Green Belt changes proposed in the Submission Local Plan is contained at **Appendix 1** to this Note.
- 1.5 The Councils approach to the Green Belt on some individual allocation sites was also queried during the Examination in Public. The Council has reflected on those discussions and now proposes some modifications to its approach which, if supported by the Inspector, will result in some further changes to the Green Belt boundary different to those set out in the SLP. These are all fully explained below as part of this Note.

2.0 Clarification of Green Belt Changes

- 2.1 Currently, the Submission Local Plan sets out in Table 6, on page 67, the total area to be removed from the Green Belt in relation to each proposed allocation, which includes both land within the allocation and areas of land outside the allocation which are a ‘*consequential change*’ as described in 1.3 above. The Council accepts that, although it believes that the proposed removal of all land from the Green Belt is justifiable, it may more clearly and consistently explain why land outside of the land to be developed is to be removed from the Green Belt.
- 2.2 In order to provide the clarity requested by the Inspector, the Council has set out below a modified version of Table 6 from the Submission Local Plan (SLP) that explains the rationalisation of the Green Belt boundary in accordance with the NPPF paragraph 143 (f) and provides the figures for areas within and outside the allocations. This table is supported by the plans in **Appendix 1**, which have the same references as the policy number shown in column 1. It also shows the total area to be removed in comparison with the figure shown in the SLP.
- 2.3 Reflecting on the discussions on Green Belt proposals at the Examination in relation to specific sites during the examination, the Council proposes changes to three sites:
- Policy AL/RTW 16 - Land to the west of Eridge Road, at Spratsbrook Farm,
 - Policy AL/PE 4 Land at Downingbury Farm Pembury – currently part of the allocation to be retained in the Green Belt but safeguarded for expansion of the Hospice
 - Land at Colebrook House Pembury – currently proposed to be removed from the Green Belt and safeguarded for future economic use (SLP paragraph 4.127)
- 2.4 Each of these are discussed in turn below.

3.0 Policy AL/RTW 16 - Land to the west of Eridge Road, at Spratsbrook Farm

- 3.1 With regards the proposed allocation Policy AL/RTW16 - Land to the west of Eridge Road, at Spratsbrook Farm, the Submission Local Plan removes a farmstead from the Green Belt that lies between the proposed area of built development and the countryside. This point was discussed at the hearing session for this site (Session 10 Friday 17 June PM) and appears inconsistent with other allocations as the farmstead has a strong relationship with the countryside and is separated from the proposed developable area by dense vegetation which can provide a new defensible Green Belt boundary.
- 3.2 The Council therefore now proposes that the farmstead is not released from the Green Belt and the proposed Green Belt boundary is adjusted in this location. This results in a small reduction in the amount of Green Belt to be removed. This proposed change is set out in Table 1 of this Note.

4.0 Policy AL/PE 4 - Land at Downingbury Farm Pembury

- 4.1 At the hearing session for Matter 7, Issue 2 – Site Allocations – Pembury on Friday 24th June, there was also some discussion on Policy AL/PE4 and the proposal to safeguard the land for the future expansion of the Hospice that forms part of the proposed policy AL/PE 4 in the SLP rather than remove it from the Green Belt.
- 4.2 The Councils Hearing Statement ([Matter 7 Issue 2](#)) in response to Q23 set out at paragraph 177 that the Council proposed a modification to now remove the land which forms part of the AL/PE 4 allocation for the hospice from the Green Belt rather than to safeguard it. This is now reflected in **Table 1** and the plans contained in **Appendix 1** below.
- 4.3 Following the Inspectors comments on this allocation the Council has reconsidered its position in relation to this site and also proposes that the plan be modified to split the allocation into two parts AL/PE4a (residential) and AL/PE4b

(hospice expansion) and that both parts be removed from the Green Belt. The more detailed explanation for this approach is set out in Action Point 16. This change increases the amount of land to be removed from the Green Belt from that shown in the SLP. It should be noted that the separate Action Note on AL/PE 4 explores these policy changes further and should be read in conjunction with this Note.

- 4.4 As this Green Belt release is different, now referred to as PE4b, to that contained in the SLP, the Council has assessed the likely harm to the Green Belt over and above that which is predicted in the Green Belt Stage 3 Study ([\[CD 3.93c\]](#) pages 100 to 104). That consideration predicts the harm to be Low -Moderate with a Negligible impact on the remaining Green Belt. The additional land to be released (that which is now proposed to be subject to allocation AL/PE 4b) falls within the same Green Belt parcel (PE5) as the original PE4 proposed allocation and the existing Hospice identified in the Stage 2 Green Belt Study [\[CD 3.93b\(i\)\]](#). It is considered that AL/PE4b makes the same contribution to Green Belt purposes identified in the Green Belt Stage 3 Study as that for PE4. The additional land to be released under PE4b does have a slightly different relationship with the farm buildings and listed farmhouse of Downingbury Farm but raises the same issues as identified in the Stage 3 Study at paragraph 4.223 under Potential Mitigation measures. These measures can be incorporated into the Policy for PE4b so that overall whilst the effects on the Green Belt may be slightly greater ,the conclusion, subject to appropriate mitigation, would remain the same: harm to be Low - Moderate with a Negligible impact on the remaining Green Belt.
- 4.5 The proposed Policy for PE4a and PE4b is set out under Action Point 16.
- 4.6 Discussions on Policy AL/PE4 also raised a query in relation to the proposed new Green Belt Boundary north of the housing allocation as the Inset Map 29 (Pembury) [\[CD 3.129o\]](#) which showed an area of white land between the allocation and the new Green Belt Boundary. The Council can confirm that the Inset Map is correct and follows the boundary shown in the Stage 3 Green Belt Study but the Map 67 Site Layout Plan in the SLP is incorrect in that the landscape buffer within the allocation should be increased to extend up to the Green Belt

Boundary. A revised Layout Plan will need to be provided as part of the modifications in due course.

5.0 Land at Colebrook House

- 5.1 Land at Colebrook House Pembury has no specific policy attached to it within the Submission Local Plan but is identified at paragraph 4.127 as land to be removed from the Green Belt and safeguarded for future economic use.
- 5.2 Following discussion at the Examination, the Council has concluded that as the site has been identified for the longer-term economic needs of the Borough but not sought for specific allocation at this time, that it cannot justify its removal from the Green Belt.
- 5.3 The Council proposes that the text at 4.127 in the SLP is amended to identify the site as suitable for meeting longer term future needs for economic development beyond the Plan period and subject to future review, but for this plan it is to be retained in the Green Belt.

6.0 Proposed Green Belt changes

6.1 The suggested changes as set out above are reflected in the table below and the plans in Appendix 1.

Table 1: Proposed Green Belt Changes (modified version of Table 6 from the SLP)

Reference / Policy or Figure Number	Site Address	Description and justification for Green Belt release	Total Green Belt removed (ha)	Green Belt removed within allocation (ha)	Green Belt removed or added outside allocation (ha)
01 AL/RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	Only the area shown as residential use within allocation removed from the Green Belt. In addition, a narrow strip that covers the road to the north to be removed to rationalise the new Green Belt boundary in this location.	-5.611	-5.234	-0.377
02 AL/RTW 14	Land at Tunbridge Wells Garden Centre, Eridge Road	Only the area shown as mixed use within allocation to be removed from the Green Belt. A further narrow strip of land to the south outside of the allocation to be removed in order to rationalise the new Green Belt boundary in this location.	-5.521	-4.322	-1.199
03 AL/RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	Only the area shown as residential use within allocation to be removed from the Green Belt. This is a reduction in the area proposed to be removed under the SLP.	-5.472	-5.229	-0.243
04 AL/RTW 17	Land adjacent to Longfield Road	Only the area shown as employment use within allocation and an area of open space enveloped by the employment use on the western boundary to be removed from the Green Belt. The removal includes some	-20.235	-20.169	-0.066

Reference / Policy or Figure Number	Site Address	Description and justification for Green Belt release	Total Green Belt removed (ha)	Green Belt removed within allocation (ha)	Green Belt removed or added outside allocation (ha)
		incidental slivers of land between the allocation and the existing development.			
05 AL/RTW 19	Land to the North of Hawkenbury Recreation Ground	The whole of the allocation shown as sport and recreational use to be removed from the Green Belt.	-7.071	-7.071	-0.000
RTW Safeguarded Land	Land at Colebrooke House, Pembury Road	To be retained in the Green Belt	0.000	0.000	0.000
06 STR/SS 1	Paddock Wood (including land at east Capel)	Those areas that are currently Green Belt within the allocation (part of the western parcel) are to be removed from the Green Belt. In addition, small parcels of existing development on the northern, western and southern boundaries are to be removed to rationalise the Green Belt boundary in these locations. In addition, the current Green Belt boundary extends south of Badsell Road where it does not currently follow a recognisable feature on the ground; hence, it is proposed that the Green Belt boundary here is adjusted to create a new consistent and stronger boundary to the south and west, resulting in the removal of Green Belt on land south of Badsell Road.	-148.194	-129.976	-18.218
07 STR/SS 3	Tudeley Village	The whole of the allocation is to be removed from the Green Belt. In addition, unallocated enclaves within the site and on the boundary of the site are to be removed from the Green Belt,	-182.994	-177.728	-5.266

Reference / Policy or Figure Number	Site Address	Description and justification for Green Belt release	Total Green Belt removed (ha)	Green Belt removed within allocation (ha)	Green Belt removed or added outside allocation (ha)
		to rationalise the Green Belt boundary in this location			
08 AL/PE 1 and AL/PE 7	Land rear of High Street and west of Chalket Lane and Cornford Court, Cornford Lane	<p>For PE1, the area shown as residential use and an area of open space to the south within the allocation are to be removed from the Green Belt to ensure a robust enduring boundary,. In addition, an area of existing residential development to the east will also be removed to rationalise the Green Belt boundary in this location.</p> <p>For PE7, the whole of the allocation will be removed from the Green Belt. In addition, the adjacent developed area (Cornford House nursing home) will also be removed to rationalise the Green Belt boundary in this location.</p>	-7.603	-5.446	-2.157
09 AL/PE 2	Land at Hubbles Farm and south of Hastings Road	The whole of this allocation will be removed from the Green Belt with the exception of the area of land safeguarded for community uses that are appropriate in the Green Belt. The new Green Belt boundary will be consistent with the adjacent allocations of PE1 and PE3	-4.653	0.000	0.00
10 AL/PE 3	Land north of the A21, south and west of Hastings Road	The whole of this allocation will be removed from the Green Belt and, in addition, a narrow strip of land to the north covering Hastings Road will be removed to rationalise the Green Belt boundary in this location.	-5.463	-4.803	-0.660

Reference / Policy or Figure Number	Site Address	Description and justification for Green Belt release	Total Green Belt removed (ha)	Green Belt removed within allocation (ha)	Green Belt removed or added outside allocation (ha)
11 AL/PE 4 a) and PE4b)	Land at Downingbury Farm, Maids tone Road	The whole of the allocation is to be removed from the Green In addition, the exiting Hospice to the south east to be removed from the Green Belt to rationalise the Green Belt Boundary in this location. This is an increase in the amount of Green Belt to be released from that listed in the SLP. A drafting error on Map 67 Site Layout Plan will be corrected by extending the allocation boundary to remove an area of white land. This has no effect on the Green Belt boundary.	PE4a -3.278 PE4b 3.207	PE4a -3.278 PE4b 1.663	PE4a 0.000 PE4b 1.544
12 AL/PE 5	Land at Sturgeons fronting Henwood Green Road	The whole of the allocation that falls within the Green Belt to be removed from the Green Belt.	-0.049	-0.049	0.000
13 South West of Paddock Wood	Land west of Colts Hill close to Badsell Road	As a result of changes to the Green Belt boundary associated with STR/SS1 an area of Green Belt will be added to rationalise the Green Belt in this location (see Green Belt plans for STR/SS1).	0.000	0.000	+1.084
14 AL/SP 1	Land to the west of Langton Road, and south of Ferbies	The whole of the allocation is to be removed from the Green Belt and, in addition, a small triangle of garden land to the north is to be removed from the Green Belt to rationalise the Green Belt Boundary in this location.	-0.964	-0.790	-0.174
Totals (ha)			-399.231 (-5.596%)	-369.327	-29.904
Total within SLP Table 6			-407.576 (-5.71%)		

Reference / Policy or Figure Number	Site Address	Description and justification for Green Belt release	Total Green Belt removed (ha)	Green Belt removed within allocation (ha)	Green Belt removed or added outside allocation (ha)
Total Green belt in Borough 7,133.602 ha					

6.2 Subject to any further consideration and noting of the changes set out earlier in this note, it will be necessary to amend the supporting text for STR9 to reflect the clarifications and changes proposed.

Appendices

Appendix 1: Green Belt Maps



Map Series
**SUBMISSION LOCAL PLAN
 PROPOSED GREEN BELT REMOVAL**

Map Object
Allocation Reference: RTW5

Site Size
MGB Removed: 5.611 ha

Legend

- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

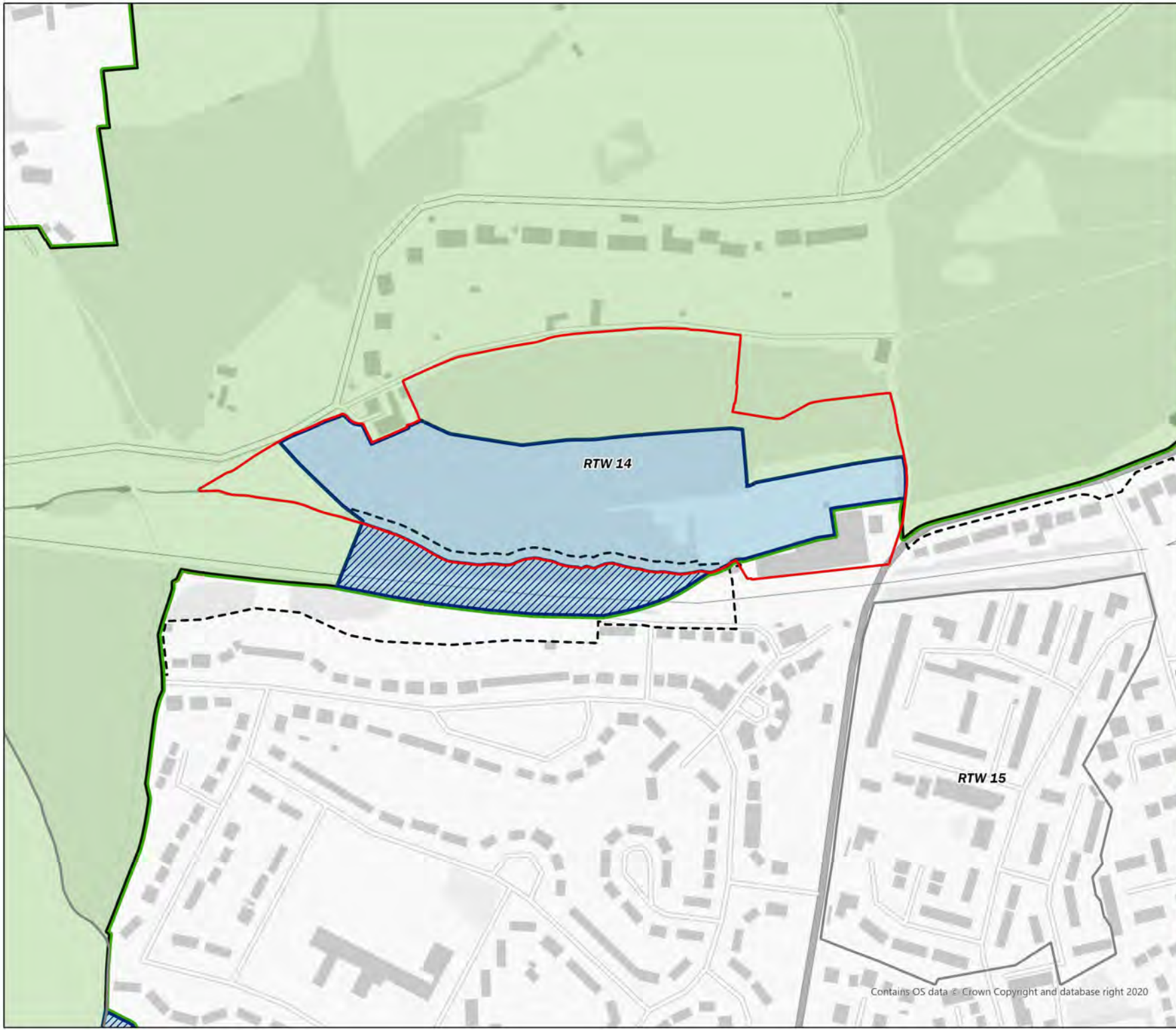
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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: RTW14

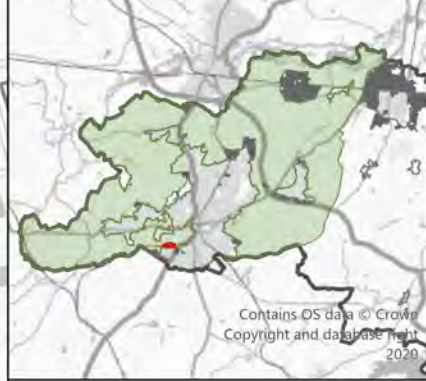
Site Size

MGB Removed: 5.521 ha

Legend

- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

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Map Series
**SUBMISSION LOCAL PLAN
 PROPOSED GREEN BELT REMOVAL**

Map Object
Allocation Reference: RTW16

Site Size
MGB Removed: 5.472 ha

Legend

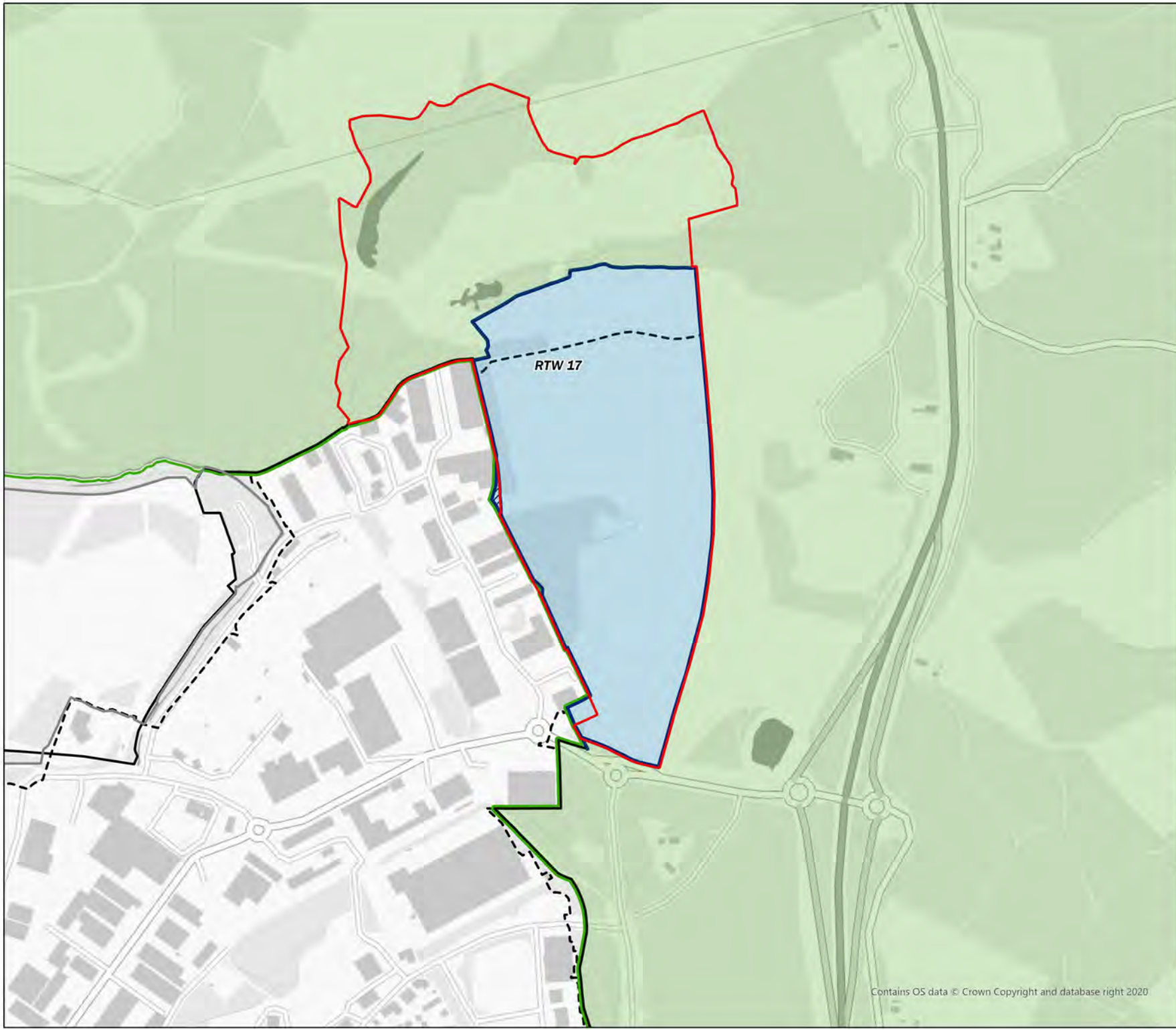
- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: RTW17

Site Size

MGB Removed: 20.235 ha

Legend

- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

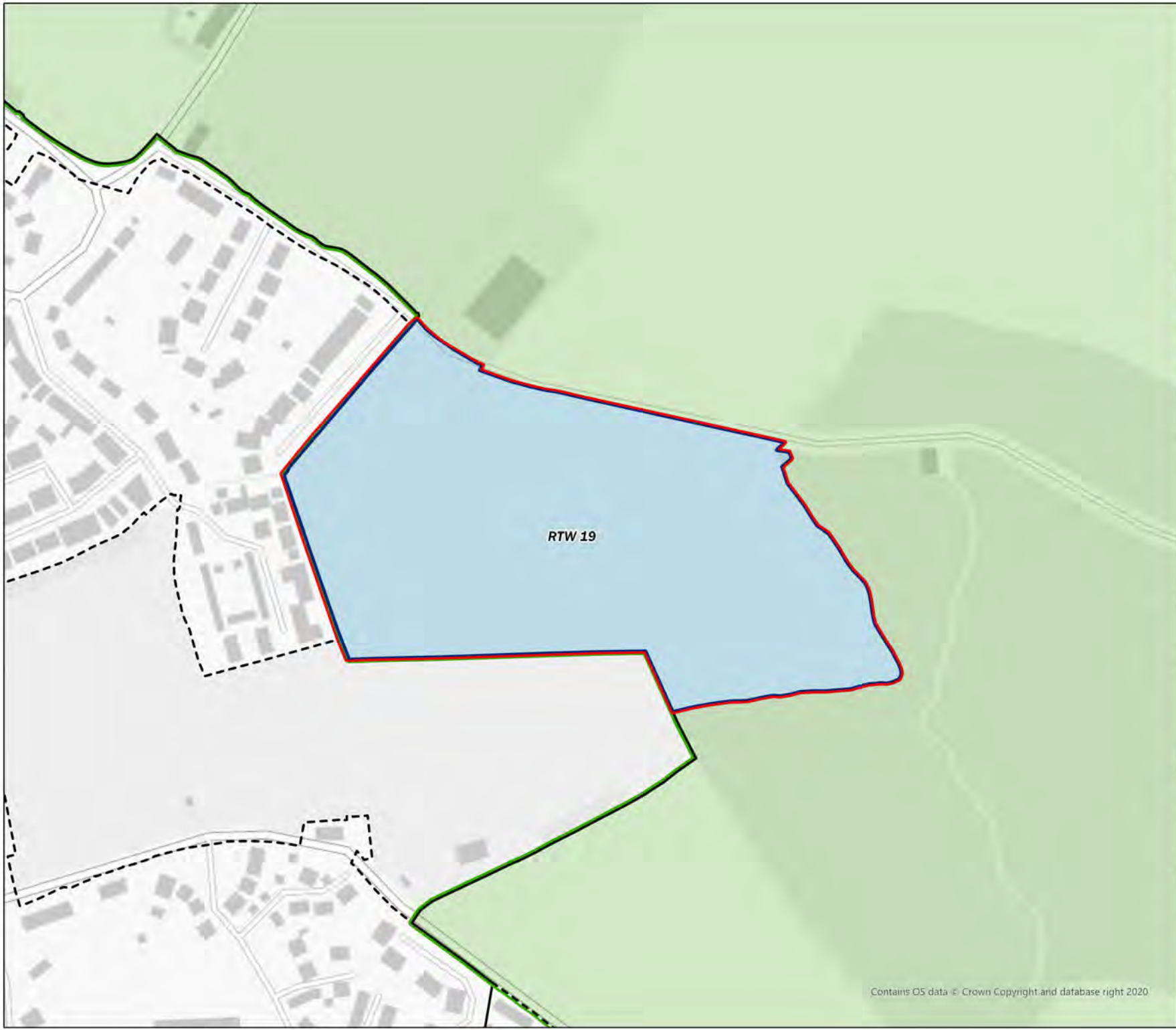
Overview



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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: RTW19

Site Size


MGB Removed: 7.071 ha

Legend

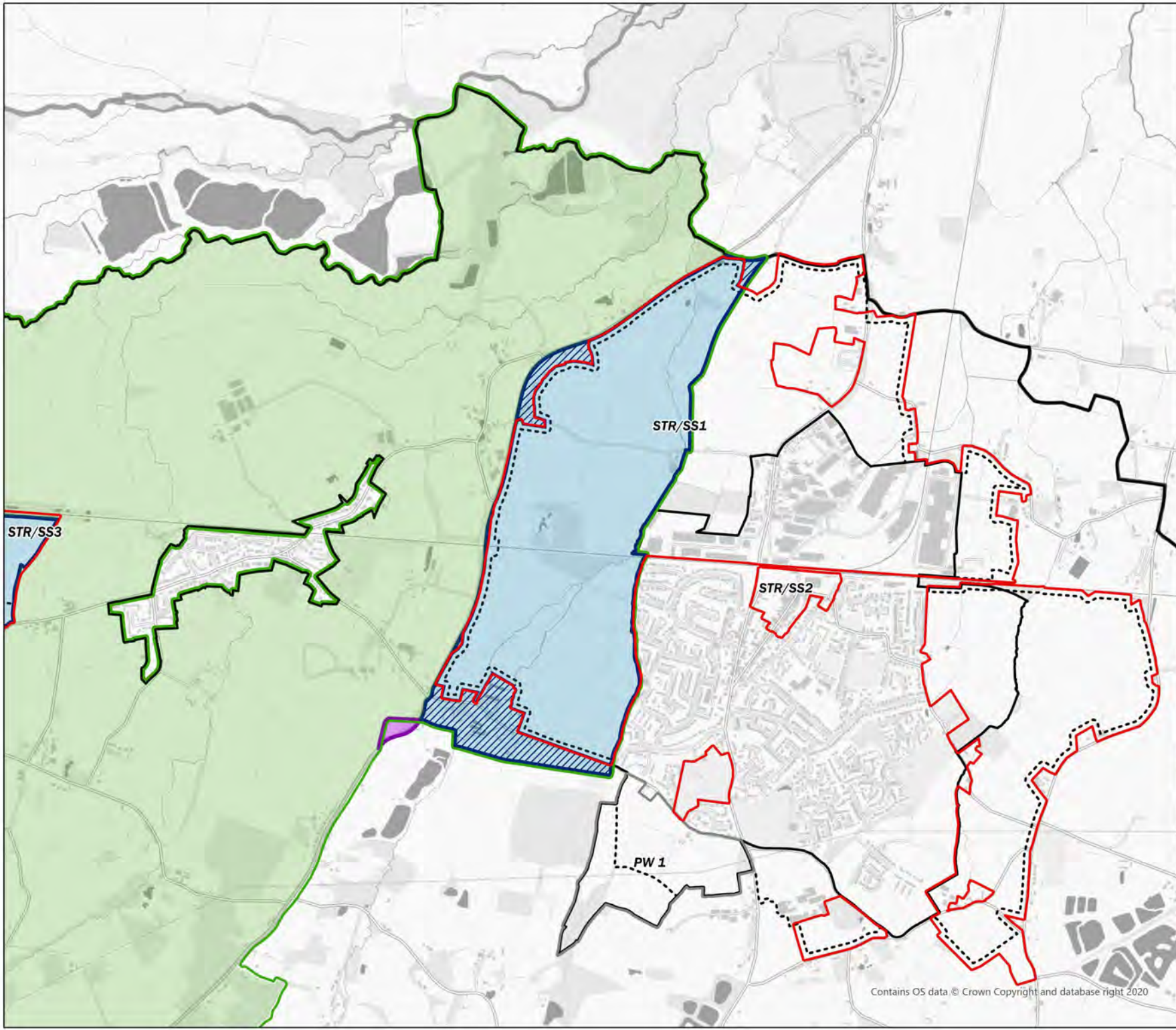
- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: SS1

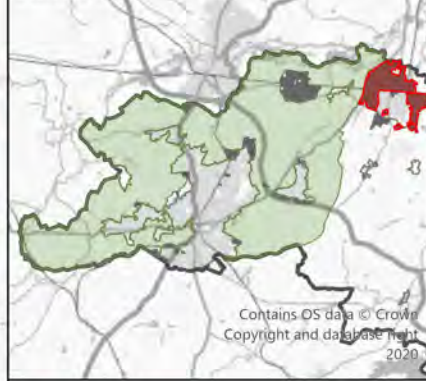
Site Size

MGB Removed: 148.194 ha

Legend

- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Area to be Added to MGB
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

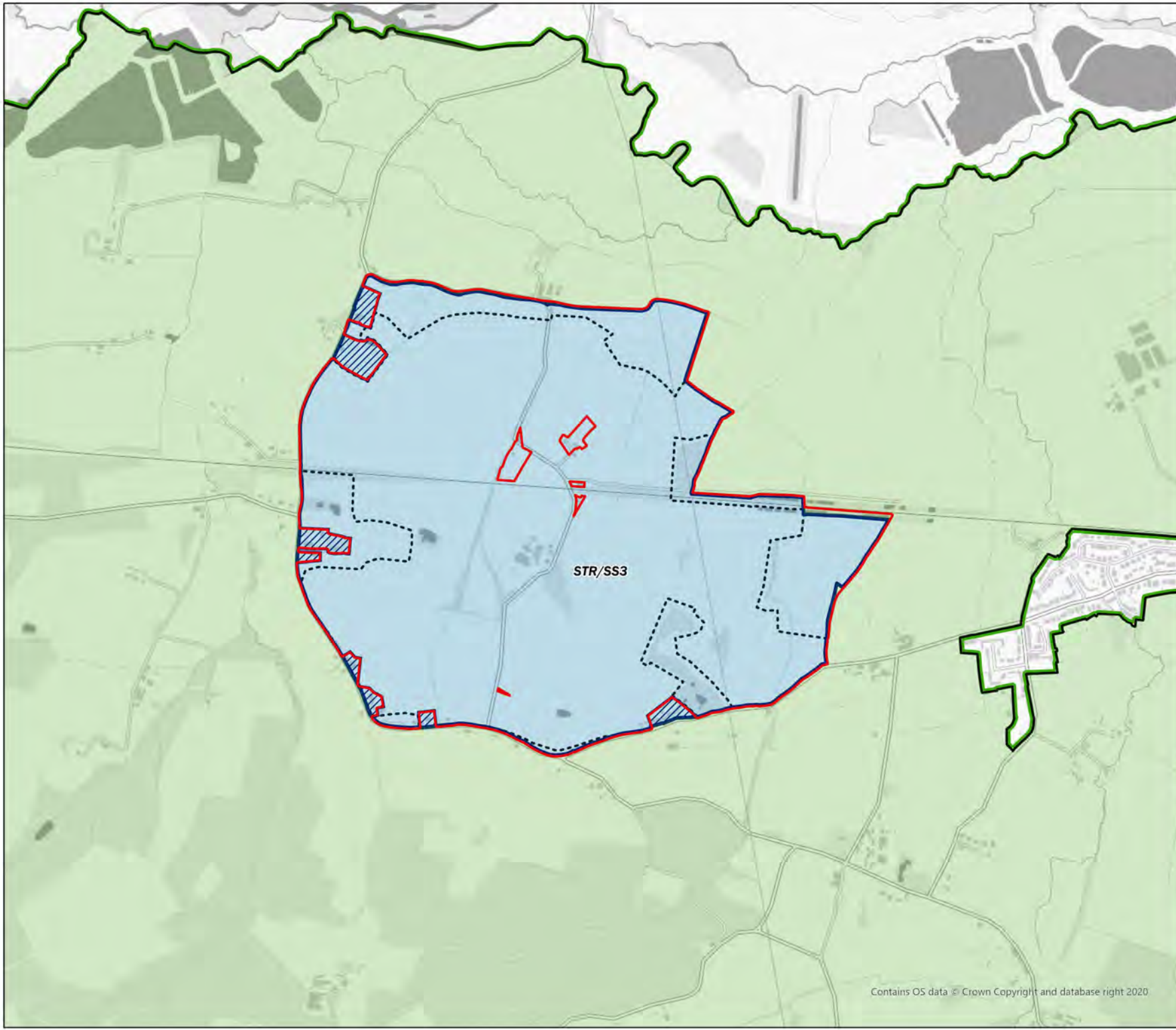
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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: SS3

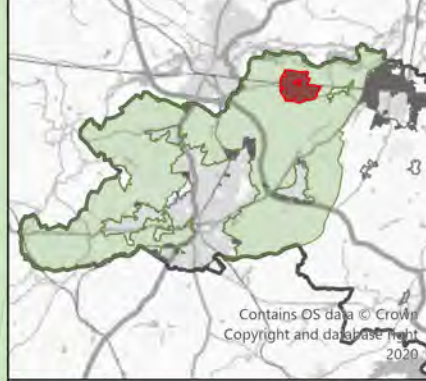
Site Size

MGB Removed: 182.994 ha

Legend

- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

Overview

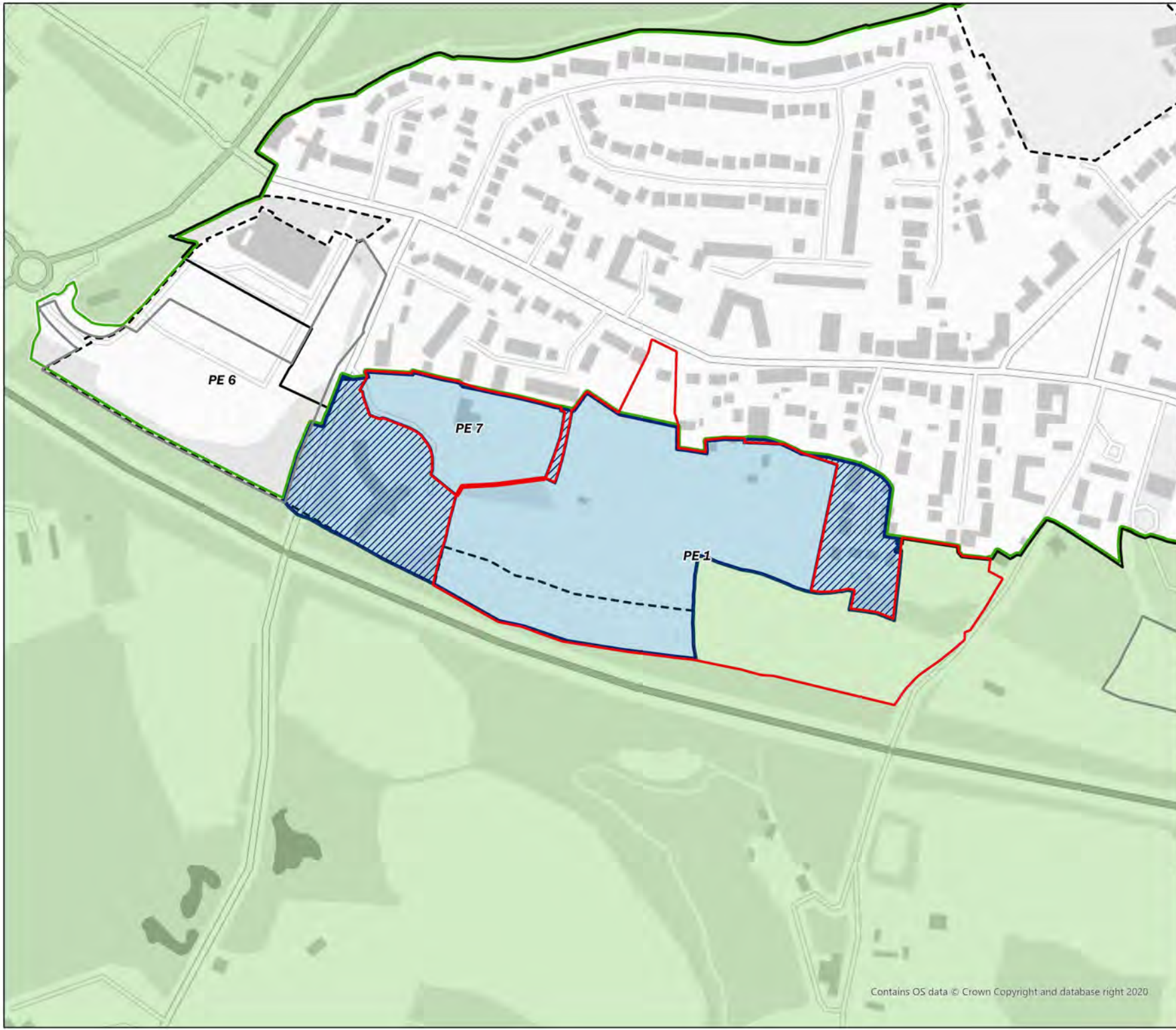


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Map Series
**SUBMISSION LOCAL PLAN
 PROPOSED GREEN BELT REMOVAL**

Map Object
Allocation Reference: PE1/7

Site Size
MGB Removed: 7.603 ha

- Legend
- Site Allocation Boundary
 - Strategic Site Allocation Boundary
 - Other Site Allocation Boundary
 - Adopted MGB
 - Area to be Removed from MGB (Outside Allocation)
 - Area to be Removed from MGB (Inside Allocation)
 - Adopted Limits to Built Development
 - Proposed Limits to Built Development
 - Provisional Limits to Built Development
 - Local Plan Boundary



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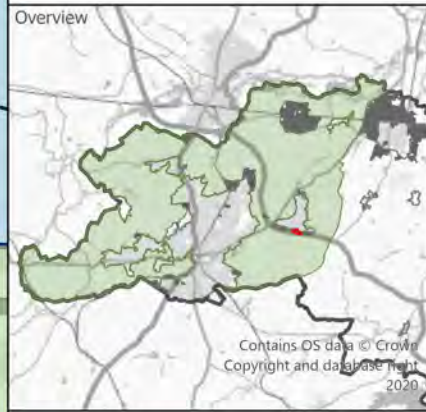


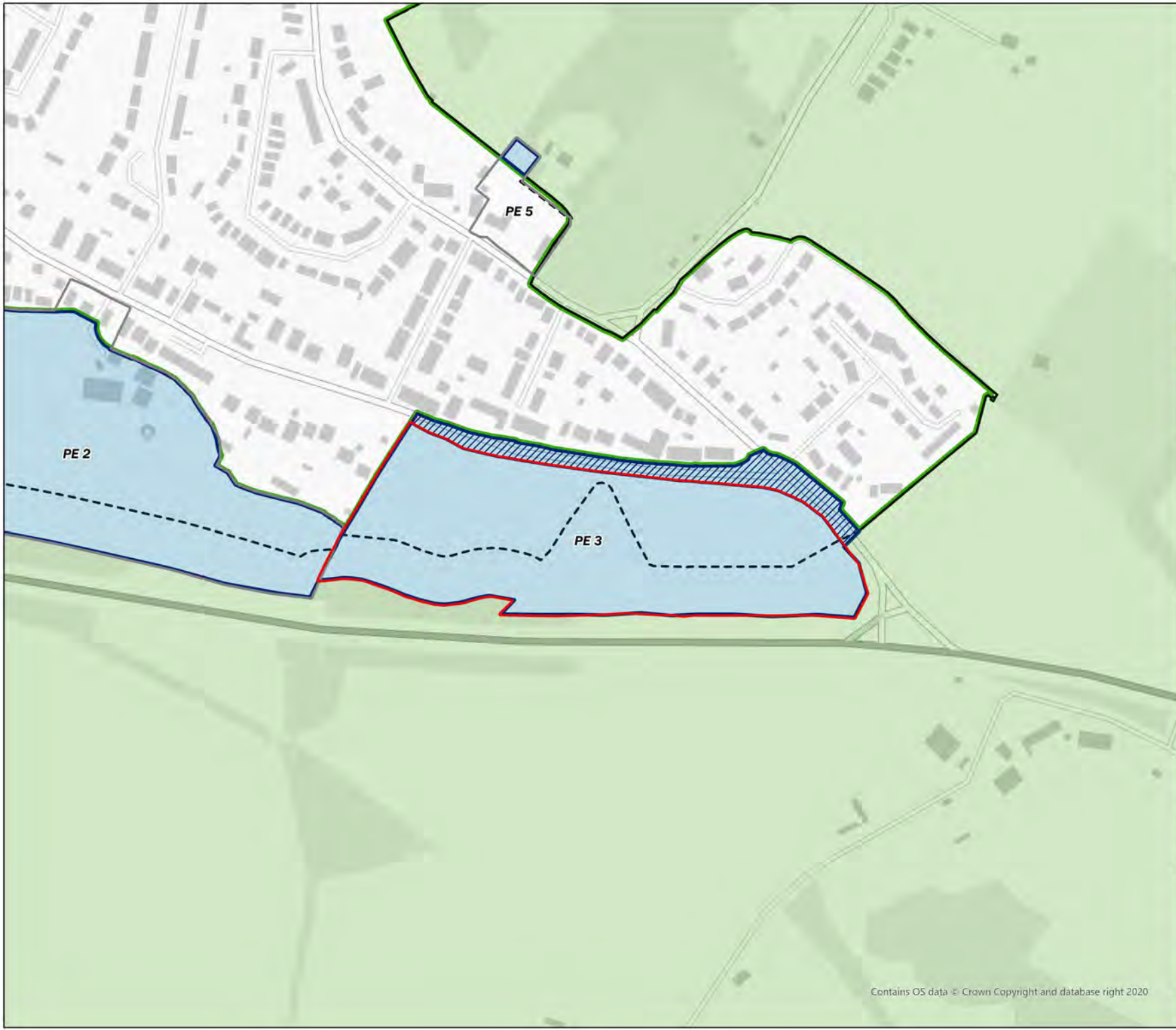
Map Series
**SUBMISSION LOCAL PLAN
 PROPOSED GREEN BELT REMOVAL**

Map Object
Allocation Reference: PE2

Site Size
MGB Removed: 4.653 ha

- Legend
- Site Allocation Boundary
 - Strategic Site Allocation Boundary
 - Other Site Allocation Boundary
 - Adopted MGB
 - Area to be Removed from MGB (Outside Allocation)
 - Area to be Removed from MGB (Inside Allocation)
 - Adopted Limits to Built Development
 - Proposed Limits to Built Development
 - Provisional Limits to Built Development
 - Local Plan Boundary





Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: PE3

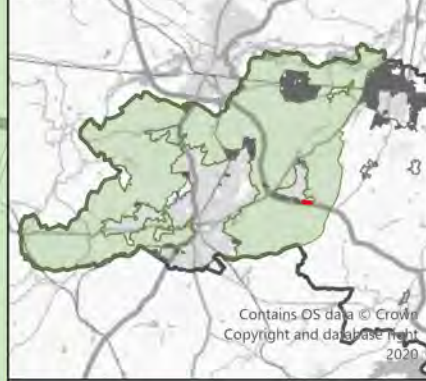
Site Size

MGB Removed: 5.463 ha

Legend

- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: PE4a/b

Site Size

**MGB Removed:
PE4a 3.278 ha
PE4b 3.207 ha**

Legend

- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: PE5

Site Size

MGB Removed: 0.049 ha

Legend

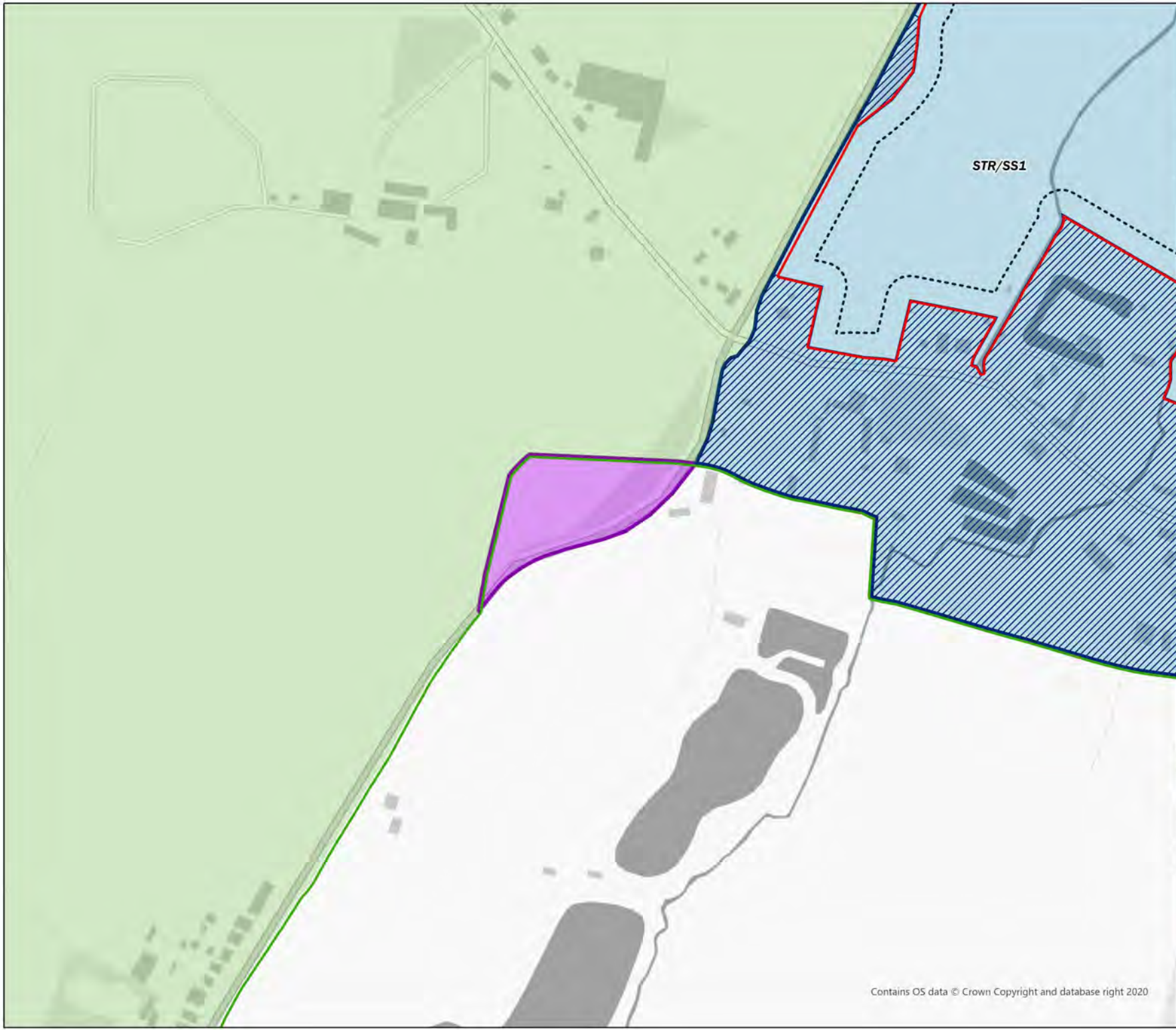
-  Site Allocation Boundary
-  Strategic Site Allocation Boundary
-  Other Site Allocation Boundary
-  Adopted MGB
-  Area to be Removed from MGB (Outside Allocation)
-  Area to be Removed from MGB (Inside Allocation)
-  Adopted Limits to Built Development
-  Proposed Limits to Built Development
-  Provisional Limits to Built Development
-  Local Plan Boundary

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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

**Allocation Reference:
Land south west of Paddock Wood**

Site Size

MGB Added: 1.084 ha

Legend

- Strategic Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Area to be Added to MGB
- Adopted Limits to Built Development
- Proposed Limits to Built Development
- Provisional Limits to Built Development
- Local Plan Boundary

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Map Series

**SUBMISSION LOCAL PLAN
PROPOSED GREEN BELT REMOVAL**

Map Object

Allocation Reference: SP1

Site Size

MGB Removed: 0.964 ha

Legend

- Site Allocation Boundary
- Strategic Site Allocation Boundary
- Other Site Allocation Boundary
- Adopted MGB
- Area to be Removed from MGB (Outside Allocation)
- Area to be Removed from MGB (Inside Allocation)
- Adopted Limits to Built Development
- Proposed Limits to Built Development
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