

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 3: Spatial Strategy and
Distribution of Development
(Policies STR1, STR3, STR9
and STR10)**
Issue 1: Spatial Strategy

Document Reference: TWLP/014



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Matter 3 – Spatial Strategy and Distribution of Development (Policies STR1, STR3, STR9 and STR10)

Issue 1 – Spatial Strategy

Inspector’s Question 1: [re. settlement hierarchy]

Does the submission version Local Plan contain a settlement hierarchy in the same way as the adopted Core Strategy (2010) does?

TWBC response to Question 1

Introduction

1. In essence, the settlement hierarchy is not presented in the same way, whilst still being an important consideration in the distribution of development. This is explained below.
2. In the existing Tunbridge Wells Core Strategy 2010 [[CD 3.118](#)], the Spatial Strategy is set out in Box 3, page 16. This strategy essentially has a three-tier approach, with the majority of new development at Royal Tunbridge Wells and Southborough, further development at Cranbrook, Hawkhurst, and Paddock Wood, and limited development in the villages. The settlement hierarchy is set out in Box 4, with a basic percentage split between each tier at Table 3 (all on page 16 of the Core Strategy).
3. Quantities of development are set for each of the above-named settlements, with some variations between those in the middle tier, notably to reflect opportunities and constraints. However, there is no distribution indicated between the villages. Most critically, the Core Strategy does not include site allocations. Its Policy CP1 states:

“In pursuit of the Spatial Strategy set out in Box 3 (Chapter 4) and to ensure that development is delivered in a managed way, the Borough Council will allocate sufficient sites in the Allocations DPD and Town Centres Area Action Plan DPD to meet the Borough’s known development needs as set out in Core Policies 6-14.”

4. Therefore, the settlement hierarchy, together with the ‘shares’ of development associated with it, had a particular purpose in guiding the subsequent Site Allocations Local Plan [[CD 3.119](#)], particularly for the villages.
5. In contrast, the new Local Plan [[CD 3.128](#)] is a comprehensive Local Plan, also containing site allocations. In this context, the respective roles of settlements, in terms of the relative (and absolute) levels of services and facilities, as reflected by the settlement hierarchy, is already considered in the balance with other factors in determining the overall spatial strategy, the distribution of development and site allocations.
6. On this basis, it is considered appropriate to refer to the settlement hierarchy as something to which regard is had, rather than make it a separate component of the Local Plan.
7. Indeed, this is how it is highlighted in relation to the Development Strategy in Section 4, where it states (on page 41) that in order to achieve the development strategy, the Local Plan “*Provides for the growth of settlements, having regard to their role and function, constraints, and opportunities...*”.
8. It is most notable that there is no obvious policy in the Local Plan to which reference to the settlement hierarchy would directly relate.
9. It would be possible to include the settlement hierarchy in a background paragraph, for context, it is also appreciated that there is, especially at the present time, service provision is dynamic. Hence, particularly for the villages, it may be inappropriate to ‘fix’ the hierarchy, as set out in the Settlement Role and Function Study [[CD 3.27](#) and [CD 3.133](#)] within the Local Plan.

Inspector's Question 2: [re. methodology]

The Settlement Role and Function Study Update¹ scores settlements and groups them together between A and G. Is the methodology used robust and are the outcomes accurate?

TWBC response to Question 2

Introduction

10. The Settlement Role and Function Study Update [[CD 3.133](#)] provides information about settlements (those listed at paragraph 3.9, page 11 of the Study and which have a Limits to Built Development (LBD) boundary defined by current planning policies) in the borough in terms of their services and facilities. More detail is given about the purpose of the Study under Question 3 below.
11. The methodology used (described in more detail below) scores each settlement against a list of criteria based on the services/facilities present. The settlements which share similar scores and characteristics in terms of the levels of services and facilities they currently provide are grouped together. The groupings A to G are presented in Table 6, page 24 of the Study Update [[CD 3.133](#)].
12. The opportunity was taken to survey and verify the existing services and facilities in the settlement of Southborough; however, RTW, as the main urban and higher order settlement of the borough, was not reviewed as part of the Study but is still included and ranked in the final outcomes/settlement groupings.

Review/methodology

13. For the Study Update [[CD 3.133](#)], an initial desk-top review of the existing lists of services and facilities produced for each settlement under the previous Settlement Role and Function Study, 2017 [[CD 3.27](#)] was undertaken. The outcomes were then checked by the town/parish councils drawing on detailed local knowledge of each settlement (listed at paragraph 13, page 13 of the Study Update). Verification was received from all town and parish councils and the information relating to services and facilities for each settlement was amended and updated to take account of the comments received.

¹ Core Document 3.133

14. As explained at paragraph 3.14, page 14 of the Study Update, although a number of premises/facilities were closed due to Covid-19 restrictions when initially checked as part of the desk-top review, and the lists sent out to parish and town councils at the end of June 2020, the consultation period was timely in terms of parish and town councils being able to confirm what facilities/premises had re-opened again from 04 July 2020 when lockdown restrictions were eased, and in some cases those that had unfortunately permanently closed.
15. The list of key and other services was also reviewed and amended for the Study Update. Table 2 on page 17 of the Study Update lists the key and other services for the Settlement Role and Function Study 2017 and the updated Study for the Pre-Submission Plan.
16. For the previous Settlement Role and Function Study 2017 [\[CD 3.27\]](#), a scoring method was used to evaluate the level of provision comprising four alternative weightings, to sensitivity test the scores of services and facilities provided by each settlement. These scores are shown in Table 3 on pages 16 and 17 of the Study Update [\[CD 3.133\]](#). The scoring system is devised in order to rank the villages according to the level of services and facilities available, which in turn enables the grouping/hierarchy of settlements. The higher the settlement scores, the more sustainable that settlement is considered to be. A full explanation of how the scoring system was used for the 2017 Study is set out on pages 17 to 19 of the Study Update [\[CD 3.133\]](#).
17. The four alternative weighting methods were used again in the Study Update [\[CD 3.133\]](#). However, to refine this, provide a more robust methodology, and to give a more accurate reflection of the level of service and facilities that each settlement provides, it was considered appropriate to score the provision of some of the facilities and services for each settlement against an additional new weighted method as set out in Table 4 on pages 20 and 21 of this Study. The review also took into account the comments received in respect of the 2017 Study as part of the Issues and Options Consultation 2017 (see paragraph 2.12, pages 7 and 8).
18. Paragraphs 3.16 and 3.17 on page 20 explain the amendments which were applied to the scoring. While higher scoring for key services such as post office and convenience store, schools, train station, remains the same, scoring for comparison and convenience shops is changed to be more graduated, so as not to distort the incremental contribution

of each single shop. The presence of societies also has graduated scoring; where there is more than one place of worship, scoring is capped at three points. It also gives greater weight to the existence of a pharmacy, dentist, and opticians, which provide a key, and higher level, service for all age groups, with a pharmacy recognised as particularly valuable, complementing a doctors' surgery. Broadband provision, which has been significantly advanced since the last review, is also weighted, attributing one point where superfast broadband exists and two points for ultrafast provision.

19. The findings as shown in Table 5 on page 22 of the Study Update [[CD 3.133](#)] show that larger settlements tend to score more highly across the range of sustainability indicators identified in terms of the level of provision of services and facilities, with smaller settlements generally scoring lower. Based on the scores and evidence collected in the updated Study, the table of settlement grouping referred to in the first paragraph above, Table 6 on page 24 was collated.
20. As set out at paragraph 1.9 on page 2 of the Study Update, the findings of the Study are considered to be as accurate as possible at the time it was undertaken (valid as of July 2020). However, it is also important to note that this Study is based on a snapshot in time, and current services and facilities available in the surveyed settlements, including the availability of public transport routes, may be subject to change in the future, notably when the longer-term consequences of Covid-19 restrictions are known.
21. In summary, drawing on parish and town councils' local knowledge, and having refined (and sensitivity tested) the scoring method relating to the provision of facilities and services for each settlement, it is considered that the Settlement Role and Function Study Update uses a robust methodology to provide the most accurate outcomes possible.

Inspector's Question 3: [re. purpose and use of the study]

***What is the purpose of the Settlement Role and Function Study Update?
How has it informed the Plan?***

TWBC response to Question 3

Purpose

22. As identified at paragraph 1.5 on page 3 of the Settlement Role and Function Study Update [[CD 3.133](#)], the key aims and objectives of the Settlement Role and Function Study are:
- to identify and document key services and facilities within each of the settlements
 - to score each settlement against a list of criteria based on services/facilities present
 - to group the settlements based on these scores to identify a settlement hierarchy, with settlements of similar characteristics in terms of the levels of services and facilities they currently provide, to inform the location of future growth
23. As well as providing an updated evidence base to help inform the settlement hierarchy of the borough for the new Local Plan, the Study, as mentioned above, also gives an indication of each settlement's level of sustainability and potential to accommodate further growth.

How has it informed the Plan?

24. Examples of how the Settlement Role and Function Study (both the 2017 version and the 2021 Update) has informed the Plan and its evidence base include:
- Sustainability Appraisal: It was used in the work undertaken in relation to the Sustainability Appraisal [[PS 013](#)], particularly with regard to the 'Services and Facilities' (Objective 16 – improve access to and range of key services and facilities), to form an understanding of the sustainability of settlements within the respective growth strategy options; also in scoring the strategic policies, proposed site allocations, and development management policies of the Plan where applicable. The decision aiding questions in Appendix B, page 291 show that high weighting is afforded to Objective 16, as the provision/improvement of key services is a critical issue when determining where to develop.

- Limits to Built Development: It was used in the decision to remove the Limits to Built Development boundaries at Iden Green and Kilndown, as explained in further detail under the response to Matter 3, Issue 3 – Limits to Built Development, Question 8 [TWLP/016].
- Strategic Housing and Economic Land Availability Assessment (SHELAA): It was used to inform the SHELAA site assessment sheets under the Sustainability Assessment section [see CDs [3.22a](#) to 3.22t and [3.77b](#) to 3.77r], where the provision of access to services and facilities was a key consideration in assessing whether sites were suitable for development/allocation.

25. While the outcomes of the Settlement Role and Function Study give an indication of the level of the relative sustainability of settlements in terms of access to goods and services and the need to travel, it is recognised that it can only be a starting point for considering appropriate locations for new development and growth potential. Other factors, such as transport, employment/economic, environmental, landscape, heritage, flooding, Green Belt, and land availability considerations, also need to be assessed to determine potential to accommodate growth, for which other evidence studies were produced, to support the Plan. Consequently, it may be that the growth of larger settlements is restricted by substantial environmental and/or infrastructure constraints, while suitable sites may exist in smaller settlements, which may become more sustainable as a result of growth.

Inspector's Question 4: [re. expansion of Paddock Wood]

The Development Strategy in Policy STR1 supports the "...major, transformational expansion of Paddock Wood (including land at east Capel)...". At a strategic level, what are the reasons for promoting significant new development at Paddock Wood? Is this justified?

TWBC response to Question 4

Introduction

26. The following response firstly presents an 'Overview of Paddock Wood', which sets the scene for the following 'Consideration of the extent of growth', with a brief conclusion.

Overview of Paddock Wood

27. The Development Constraints Study 2016 [CD 3.32] provided an initial overview, and mapping, of the strategic constraints to development in the borough. This included regard to Green Belt, AONB and flood risk. These are shown on Figures 6 and 7 on the last pages.

28. Paddock Wood is the only town (or 'service centre') that is not within, or effectively enveloped by, the Green Belt or the High Weald AONB, both of which carry a general presumption in favour of their retention/conservation; furthermore, respective NPPF policies for those designations (paragraphs 141 and 177b respectively) require prior consideration of alternatives elsewhere.

29. Green Belt and flood risk constraints do still impinge on the western side of Paddock Wood, as well as a swathe of land following the Tudeley Brook that cuts through the built-up area in a south-west to north-east direction.

30. The Settlement Role and Function Study Further Update October 2021 [CD 3.133] identifies Paddock Wood as sitting in the second tier of the settlement hierarchy, Group B, alongside Southborough, Cranbrook, and Hawkhurst, below Royal Tunbridge Wells, and above all other settlements (relatively speaking, this is the same as in the earlier version, at Draft Local Plan stage.) It is described, at paragraph 3.4 as follows:

"Paddock Wood, in the northern part of the borough, benefits from good transport links, including a mainline train station and wide range of facilities, including a secondary school and sports centre. There is a large employment area to the north of the railway

line, which supports the town, the rural hinterland, and beyond. In addition to a supermarket, existing retailing is mainly devoted to the provision of local services. The western edge of the town abuts the Green Belt and, additionally, areas of the town and its surrounds fall within areas of flood risk.”

31. As this highlights, Paddock Wood has not only a good range of services to meet local needs but also benefits from being on the Southeastern Main Railway Line and Medway Valley Line, with lines to London (Charing Cross approximately 45-50 minutes), Ashford International, Maidstone West, Folkstone, Canterbury, Ramsgate, and Strood. The railway station is centrally located in the town.
32. In terms of road access, the town benefits from sitting next to the A228, which is a primary route corridor from the M2 in the Lower Thames area near Strood through to the A21 at Pembury.
33. Paddock Wood also has well-established business areas, providing significant employment, with potential for expansion onto adjoining land.
34. The above factors all point to Paddock Wood potentially playing a significant part in the future growth of the borough.

Consideration of extent of growth

35. At the early stages of preparing the new Local Plan, the national planning policy context was provided by the NPPF, 2012, which stated at paragraph 52:

“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.”

36. It is further noted that this policy position has subsequently been carried forward and indeed noticeably expanded, with the current NPPF highlighting the potential for “*significant extensions*” to existing settlements (as well as new settlements) in paragraph 73.
37. Locally, there was considerable landowner/developer interest at Paddock Wood, with mainly land parcels being submitted for consideration through the ‘Call for Sites’ process, and in response to early consultations.

38. Initial assessment of these suggested that many sites were potentially suitable, but that the cumulative impacts could be significant. There was (and is) a risk that a piecemeal approach to the accretion of essentially housing developments on the edges of the town would not readily ensure that the supporting infrastructure would be provided to support the expanded community. These concerns related particularly to:
- accommodating, and promoting more sustainable, movement both within the town and to nearby settlements;
 - maintaining a balance between housing growth and employment opportunities;
 - the relationship with, and impact upon, the town centre;
 - flood risk;
 - provision of a requisite range of green space;
 - the adequacy, and means of increasing the capacity, of infrastructure generally.
39. As referenced above, national policy coverage of the potential of new settlements or significant extensions to existing villages and towns to meeting housing needs has increased over time, most notably in terms of the preparation of this Local Plan with the publication of the NPPF in July 2018. The policy requirement moved from the 2012 NPPF setting out at paragraph 52 that “...*local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development*” to “...*strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way*” (paragraph 72) before providing significantly more policy on such proposals.
40. The change to the NPPF in August 2018 was followed by the then Ministry of Housing and Local Government publishing its ‘Garden Communities’ prospectus [see [PS 021](#)]. Its ambitions in paragraph 3 included: “*We want to see vibrant, mixed-use, communities where people can live, work, and play for generations to come – communities which view themselves as the conservation areas of the future. Each will be holistically planned, self sustaining, and characterful.*” resonated with the above themes.
41. In addition, it was noted that, in setting criteria for a new garden community, paragraph 6 states: “*Proposals can be for a discrete new settlement, or take the form of transformational development of an existing settlement, both in nature and in scale. All*

proposals must be of sufficient scale to be largely self-sustaining and genuinely mixed use as per paragraphs 13 b and c.” (TWBC emphasis).

42. While the development of proposals in the borough (both for Paddock Wood and Tudeley Village) were not able to benefit from Government funding assistance through its Garden Settlements programme (as there was not a commitment to a new settlement at that time), it was nevertheless felt that the garden settlement principles were applicable to development at Paddock Wood and that, by applying them via an overarching framework for growth, would be “*transformational*”. Applying the principles of garden settlements provides for very good place shaping and creates sustainable new communities for future generations.
43. Options for both the scale and directions of growth were tested through the Sustainability Appraisal (SA) process, initially for the Draft Local Plan [see [CD 3.11](#) pages 46-49] and later, with further, refined options, through the Pre-Submission Local Plan SA [see [CD 3.62](#) pages 96-104].
44. Commentary is provided in the SA to supplement the scoring of each option, with an overview summary at paragraphs 6.2.46-6.2.49, which concludes (at paragraph 6.2.49) by saying: “*Drawing on the above draft findings and other, more detailed assessments, which point towards Option 2 being favoured, further consideration is given to related transport infrastructure below.*” This Option relates to development all around the town for some 3,500 dwellings – which approximates to the capacity identified of the strategic site at Policy STR/SS 1.
45. In line with the guidance contained within the NPPF relating to planning for significant extensions to existing towns (paragraph 72 of the NPPF 2018 and 2019), the Council, supported by the Strategic Sites Working Group, instructed comprehensive masterplanning and infrastructure work to be carried out to ensure the developments were well designed and supported by the necessary infrastructure and facilities. This is set out within the Strategic Sites Masterplanning and Infrastructure Study which was prepared by David Lock Associates [[CD 3.66](#) and appendices]. The scope and approach of work taken to inform this masterplanning exercise is set out in the Strategic Sites Topic Paper [[CD 3.67](#) Section 3.0]. As set out in the Masterplanning and Infrastructure Study [[CD 3.66](#)] there is clear evidence, and effective proposals, that address the concerns set out in paragraph 39 above, as summarised below:

- a) The Structure Plan for Paddock Wood and east Capel provides for a town-wide system of paths and cycle routes connecting the new neighbourhoods to the town centre and employment spaces – and scope for Paddock Wood to be a Low Traffic Town (page 48 of the LCWIP Phase 2 [[CD 3115b](#)]), as well as linking out of the town to nearby villages and leisure routes such as the Hop Pickers Trail. This has been fully informed by consideration of the Council’s LCWIP Phase 2 [[CD 3115b](#)]. Further, the street network of the growth areas has been masterplanned to allow an electric hopper bus loop to operate via bus gates, serving the expansion areas and connecting them to the town centre, northern employment area and railway station. See paragraphs 5.33 to 5.39 of the Masterplanning and Infrastructure Study [[CD 3.66](#)] for the full consideration of how sustainable movement has been incorporated;
- b) Significant new land for employment uses is masterplanned in the northern parcel, revitalising local employment and with walkable links from new neighbourhoods. This provides for 11.2 hectares of employment land on sites to the north and south of Lucks Lane, and to the east of Transfesa Road. They are defined Key Employment Areas and Policy STR/SS1 (Strategic Policy for Paddock Wood and east Capel) makes specific reference to Policy ED 1 in relation to the provision of employment uses. Forming part of the overall policy for the transformational growth around Paddock Wood, the employment uses will be expected to be delivered on garden settlement principles, subject to the high- quality design standards being advocated in these new settlements and being required to demonstrate schemes which encourage a modal shift towards active travel. A draft high level Masterplan for the employment parcel has been prepared by David Lock Associates. This has been presented to members of the Strategic Sites Working Group as a working draft document. This document will form the basis of future discussions and engagement with key stakeholders and the community as part of the preparation of the Framework Masterplan SPD for the northern parcel as required through Policy STR/SS1, which is being progressed in line with the timeframes set out in the Council’s published LDS [[CD 3.143](#)]. The draft high level Masterplan is included at Appendix 1 of the Council’s Hearing Statement on Matter 6, Issue 4 [TWLP/025];
- c) A revitalised town centre is being planned for with a comprehensive regeneration plan. The transformational growth proposed around Paddock Wood and east Capel is likely to double the size of Paddock Wood from present levels. This presents a

significant opportunity for Paddock Wood Town Centre. The Council is very keen to ensure that this opportunity is seized to enable this growth to facilitate investment into the town in the most appropriate way, to enhance its future vitality and viability. Accordingly, the Plan makes provisions for comprehensive investment into the town centre that can enable this objective to be realised. Policy STR/SS2 provides for this Framework, establishing key criteria and policy parameters to be developed as part of a Town Centre Framework Masterplan. As above, DLA has prepared a high-level draft Town Centre Masterplan for Paddock Wood Town Centre. This has been presented to members of the Strategic Sites Working Group, and Paddock Wood Town Council separately as a working draft document. This document will form the basis of future discussions and engagement with key stakeholders and the community as part of the preparation of the Town Centre Framework Masterplan SPD as required through Policy STR/SS, which is being progressed in line with the timeframes set out in the Council's published LDS [[CD 3.143](#)]. This Town Centre Masterplan is included at Appendix 1 of the Council's Hearing Statement on Matter 6, Issue 4 [TWLP/025];

- d) Planning strategically presents the opportunity for infrastructure to be provided which will provide betterment to the residents in the existing town. This includes, amongst other things, targeted flood embankments proposed within the north-east of the south-western western parcel, protecting the urban areas and the town. This has the effect of moving flows around the town through the north-western site towards the River Medway [[CD 3.66](#) paragraphs 5.43 to 5.48], thereby reducing flood risk to some existing parts of Paddock Wood.
- e) Masterplanned approach to the provision of green space, including the provision of a wetland park on around 25 hectares of land to the west which could be transformed into a natural space providing habitat and biodiversity improvements [[CD 3.66](#) paragraph 5.47]. Considerations of development and masterplanning at Paddock Wood have been informed by the Council's evidence base, including the Landscape Sensitivity Assessment [[CD 3.40c](#)], Green Belt Study Stage 3 [[CD 3.93](#)] and AONB Setting Analysis Report [[CD 3.95](#)];
- f) A full and complete schedule of infrastructure provision not only to mitigate the impacts of the growth, but also to ensure the new development meets the Plan's

policy objectives and the garden settlement principles [[CD 3.66](#) Table 11 page 132]. The includes the delivery of some shared items of infrastructure – such as a concentrated area of playing pitches and the potential for a 25m swimming pool (which has been a long-held aspiration of Paddock Wood).

46. The impact on the Green Belt, and its justification, is separately considered under Matter 4 and Matter 6 Issues 3 [TWLP/020 and TWLP/024 respectively].

Conclusion

47. The significant growth is considered to be fully justified, as summarised above. Furthermore, the comprehensive policy framework provided by Policy STR/SS 1, with provisions for future SPDs, is regarded as critical. This ensures effective delivery of the expanded settlement, including the provision of key infrastructure, notably a new sports and leisure hub for the town, a new health centre, and major transport and access improvements, as well as facilitating valuable reductions in flood risk affecting the town.

Inspector’s Question 5: [re. justification for a new settlement]

The Development Strategy also supports the “...creation of a new garden settlement: Tudeley Village...”. What were the reasons for pursuing a new, standalone settlement, rather than the expansion of existing towns and villages? Is this justified?

TWBC response to Question 5

Introduction

48. The background to pursuing a new stand-alone settlement is set out in Section D and Section G of the Development Strategy Topic Paper [[CD 3.126](#)].
49. In brief, the answer is that:
- a) the creation of a standalone settlement was seen as a potentially sustainable means of accommodating a significant amount of new development, especially given known constraints for the growth of existing settlements, and investigated accordingly
 - b) all reasonable options for sustainable growth in the borough were explored, including for some quite large proposals at existing settlements, including through the Draft Local Plan
 - c) greater (than now proposed) growth at existing towns and villages is ruled out following detailed site assessments (whilst also noting the provision being made for transformational significant growth at Paddock Wood)
 - d) although options have been considered, the Sustainability Appraisal found that there is no reasonable alternative to Tudeley Village as a potential new settlement location, which in turn has led to a detailed evaluation of its merits
 - e) having carefully considered its merits, notably the potential for creating a sustainable community based on garden settlement principles through a comprehensive approach, its contribution to meeting housing needs, important role in reducing flood risk, and other environmental opportunities on the one hand, with loss of Green Belt, as well as some heritage and landscape impacts on the other, it was concluded that, on balance, the proposal is justified

Sustainability Appraisal

50. As set out in the Council's response to the Inspector's Question 6 on the Sustainability Appraisal (SA) [[TWLP/003](#)], five different distributions of development for the Standard Method local housing need figure of 678 dwellings per year that did not rely on a new settlement at Tudeley have been considered. These are described in Table 12 on pages 48-51 of the SA [[CD 3.130a](#)] and the Development Strategy Topic Paper [[CD 3.126](#)]. The outcomes from these assessments are described in detail in paragraphs 6.2.11-6.2.15 on pages 80-81 of the SA [[CD 3.130a](#)]. The SA explains that including the strategic sites brings about a number of stronger positive scores as a result of the beneficial masterplanning approach which will support more sustainable forms of development.

Spatial options

51. As noted in response to the previous question, only Paddock Wood offers scope for substantial expansion. Royal Tunbridge Wells/Southborough has grown to be fairly hard-up against the enveloping AONB and Green Belt, while Cranbrook, Hawkhurst and the other higher order settlements, are within the High Weald AONB and accordingly restricted in terms of their development. Also, while the 'Villages and Rural Areas' were assigned relatively little growth under the Core Strategy [[CD 3.118](#)] (see Table 3 page 16), the much-increased rate and scale of housing growth generated by the standard method, compared to the existing Core Strategy figure (678 dpa compared to 300 dpa), meant that new spatial options had to be considered.
52. Hence, the Issues and Options consultation [[CD 3.6a](#)] included a new settlement option (Option 5), as well as progressively greater distributions of growth to towns and villages, and a focus on the 'A21 Corridor', (essentially on northern edge of RTW and southern edge of Pembury).
53. The A21 Corridor and a new settlement were the most supported combination of options, with the former being the most favoured single option. (See Issues and Options Consultation Statement. [[CD 3.8a](#) and [3.8b](#)].
54. The support for a new settlement chimed with the [NPPF 2012](#) encouragement of new settlements at paragraph 52 (which has been followed through in subsequent versions of the NPPF, the most recent set out in paragraph 73, NPPF 2021), as quoted in

relation to Question 4 above. The advantages of garden settlements were also subsequently promoted in 2018 in the MHCLG's Garden Communities prospectus [[PS 021](#)] and supported through Garden Settlements Programme.

Site assessments

55. At every stage, the SA progressed alongside the consideration of sites by planning officers, and their presentation through the Strategic Housing and Employment Land Availability Assessment (SHELAA).
56. All sites were appraised against a consistent methodology (see the Council's Hearing Statement in relation to Matter 5, Issue 1 – Site Selection Methodology [TWLP/021]). Hence, the scope for the expansion of existing towns and villages has been robustly assessed.
57. Site assessments largely confirmed the limited opportunities for greater sustainable growth of towns and villages, with the clear exception of Paddock Wood. There were some settlements where greater scales of development were consulted on through the Draft Local Plan [[CD 3.9](#)], notably at Royal Tunbridge Wells/Southborough, together with Cranbrook and Hawkhurst, being higher order settlements and, relative to their size and services, at some smaller settlements, including Lamberhurst, Sissinghurst, and Matfield. This reflected submitted sites where arguments could be made for their individual merits, based on information available at the time. In fact, partly in response to consultation responses and with the benefit of further assessment, notably LVIAs of larger sites, these marginal sites proved unacceptable.
58. Three sites, one in Cranbrook, one in Hawkhurst, and one in Sissinghurst, which were consulted upon at Regulation 18 stage, but not included in the Regulation 19 Pre-Submission Local Plan have been the subject of applications and appeals, all of which have been dismissed.
59. These decisions support the Council's judgements on the suitability of sites around existing towns and villages, even when a less than five-year housing land supply was a factor.
60. With regard to Royal Tunbridge Wells and Pembury, a number of sites on the fringes of both settlements that fell within the scope of the 'A21 Corridor' growth option were

considered. While the whole of the Corridor beyond the existing built-up areas is covered by Green Belt and/or AONB designations, some sites, for employment use on the edge of Royal Tunbridge Wells (AL/RTW 17) and for housing on the edge of Pembury (AL/PE 1-3), were found to meet relevant 'exceptional circumstances' tests.

61. As discussed in response to the earlier Stage 1, Issue 3, Question 7 [Document Reference: [TWLP/003](#)], while alternatives were considered, there were no other “*reasonable alternatives*” to the proposed new settlement at Tudeley Village. Hence, the potential for this to provide a sustainable community based on garden settlement principles was carefully scrutinised.
62. The NPPF recognises (at paragraph 73) that the supply of a large number of new homes can often best be achieved through planning on a strategic scale, such as for new settlements. This option provides for a quantum of development which can deliver a significant level of strategic infrastructure, with an effective movement framework, to ensure that development is as sustainable as possible, which is not generally possible through the incremental growth of towns and villages.
63. Alongside these advantages of being able to plan a settlement comprehensively from the outset, there is the clear deliverability provided by land in a single ownership, not only for the planned development, but also of the surrounding land that may be utilised to meet a range of environmental and access objectives. In particular, significant weight is attached to the benefits that comprehensive masterplanning affords to addressing existing downstream flood risk at Five Oak Green which can be delivered by way of compensatory improvements to the release of Green Belt land, partly on land under the ownership of Hadlow Estate (the landowner of Tudeley Village) and partly on land to be secured for the provision of highway infrastructure.
64. The benefits, and compensatory improvements, have to be weighed against the loss of Green Belt, as well as some heritage and landscape impacts. However, although a finely balanced judgement, it is concluded that it is appropriate – and more acceptable than the harms that would stem from further growth of the existing towns and villages beyond that within the Local Plan.
65. As set out in the questions under Matter 6, Issue 1 [TWLP/022], comprehensive masterplanning work was undertaken ahead of Regulation 19 consultation to ensure the

new settlement could be delivered in line with the garden settlement principles sought by the Council. As set out in the Strategic Sites Topic Paper [[CD 3.67](#)], paragraphs 3.10-3.13, the Council required confidence that this sustainable settlement could be created along with the requisite infrastructure and services, to be ultimately reflected in policy. This required a detailed assessment of the site's opportunity and constraints, reflected through a comprehensive masterplanning exercise. Alongside this the Council needed to have confidence that the development was deliverable, i.e. viable.

66. The Hadlow Estate commissioned its own Masterplanning Study, as detailed in the Tudeley Village Delivery Strategy (submitted by Hadlow Estate as part of its Reg. 19 consultation response). This exercise was led by Turnberry Consulting with input from an extensive consultant team. Alongside this, David Lock Associates prepared a detailed infrastructure framework [[CD 3.66](#) Table 11] which identifies infrastructure capacity requirements stemming from both Strategic Sites: Paddock Wood and east Capel; and Tudeley Village. The infrastructure identified not only mitigates against the growth but allows for the deliverability of the new settlements on garden settlement principles. This infrastructure has been fully costed and considered by Dixon Searle in its Stage 2 Viability Assessment [[CD 3.65](#)]. This confirms that the site is deliverable.
67. The masterplanning work was also informed by the Council's Green Belt Study Stage 3 [[CD 3.93](#)] and AONB Setting Analysis Report [[CD 3.95](#)].

Conclusion

68. In conclusion, the Council considers that the creation of a new garden settlement: Tudeley Village is justified, having duly considered all other reasonable growth options, for the reasons summarised at paragraph 50 above.

Inspector's Question 6: [re. growth potential at Royal Tunbridge Wells]

Paragraph 4.45 of the submitted Plan states that Royal Tunbridge Wells is surrounded by the High Weald AONB, except for areas to the west and the north. What options has the Council therefore looked at for new development to the west and the north of the town? Why were they discounted in favour of a standalone new settlement (which also requires land to be removed from the Green Belt)?

TWBC response to Question 6

Introduction

69. In responding to this question, it is assumed that the question relates to both Royal Tunbridge Wells and Southborough, as paragraph 4.45 of the submitted Local Plan references both. Moreover, they are conjoined and together are recognised as 'the main urban area' in the borough. Accordingly, reference is made to the Submission Local Plan (SLP) Inset Maps 1a-d and Inset Map 3, which show both settlements and the relevant designations and policy areas.

Context

70. For context, paragraph 4.45 of the SLP [[CD 3.128](#)] is part of a broad overview of the approach to the overall Development Strategy at Policy STR 1, which follows a summary of the reasoning for strategic growth at Paddock Wood, and states:

"In contrast, while the Main Urban Area of Royal Tunbridge Wells, along with Southborough, would be a prime candidate, it is wholly surrounded by the High Weald AONB and, where the AONB does not come up to the urban edge, mainly to the west and north, those areas are designated Green Belt. They are also reliant on the A26 and A264 for access, which are both observably congested for extended periods at peak times, with no obvious scope for significant relief, to the detriment of local amenities and the town's historic character."

71. As stated, and evident from the Inset Maps, the existing urban area is virtually bounded by the Green Belt, while the AONB is not quite as tight in a number of places. With only a couple of exceptions, all the the AONB around Royal Tunbridge Wells and Southborough is also Green Belt.

72. There are areas identified in the adopted Local Plan as “*Rural Fringe*”, which are neither Green Belt nor AONB and sit between the LBD and Green Belt/AONB boundaries. This designation is not carried forward into the SLP and further details are provided in response to Question 10, Matter 3, Issue 3 [TWLP/016].
73. There are also two areas of ‘white land’ (outside the AONB, Green Belt and LBD) to the south of Royal Tunbridge Wells on the border with Wealden District and these are part of St Marks Recreation Ground (home to the town Rugby Club) and the Borough Crematorium and Cemetery (this also has a sports pitch and is part Local Wildlife Site).
74. Green Belt land that is not within the High Weald AONB can be identified on the relevant Inset Maps but is presented more clearly on the plan at **Appendix 2**. This plan shows that there are areas of Green Belt beyond the AONB which are notably to the west, but also to a lesser extent elsewhere.

Consideration of sites and areas beyond the existing built-up area

75. All areas of land beyond the existing built-up area have been considered. In particular, these areas have been included within the Landscape Sensitivity Assessment [[CD 3.102](#)] and Green Belt Studies [[CD 3.93](#) and [CD 3.141](#)]. Consequently, in considering this response, consideration should also be given to answers under Matter 4: Principles of Green Belt Release. References below to Green Belt (GB) numbers refer to areas and parcels in the Green Belt studies as explained in Matter 4 which also assessed non-GB land (non-GB).
76. Those areas beyond the current Limits to Built Development that are outside of the AONB (as highlighted in the question) are identified in Table 1 below and on the maps in **Appendix 1**, together with an indication of whether it is Green Belt land. The maps also show SHELAA sites considered, and Green Belt parcels used in the Stage 2 Green Belt Study while the table highlights key evidence documents, designations and conclusions, including where allocations are being put forward.

Table 1 Assessment of development potential in areas around Royal Tunbridge Wells (i.e. beyond the existing Limits to Built Development)

Area	Status	Evidence	Conclusion
i. Land north of High Brooms either side of the railway; land to the east of the railway is the former landfill site, while land to the west of the railway contains an abattoir and a Local Nature Reserve.	Green Belt to west of railway and greater part is LNR. Not Green Belt to east but former Rural Fringe GB TW3 and BA1	SHELAA 72 PSLP The former landfill site was included in the Site Options Analysis – Tunbridge Wells Borough Council Sports Hub – July 2020 [PS_026]	Land east of the railway (Former Rural Fringe) is Proposed allocation – Policy AL/RTW 18 allocated for renewable or sustainable energy, sport, recreation, or leisure uses. Small part in south west is included within proposed LGS (AS_83)
ii. Educational and recreation facilities to the west of the town, the football stadium and a small Local Wildlife Site (LWS).	Not Green Belt Part LWS Former Rural Fringe designation Non-GB TW1, TW2	Established, settled uses, with the only opportunity for redevelopment being the relocation of a sports stadium. – The football stadium was assessed and rejected in the Site Options Analysis – Tunbridge Wells Borough Council Sports Hub – July 2020 [PS_026] SHELAA 235, 206	Policy AL/RTW 20 for approx. 30 dwellings, subject to relocation of sports stadium (see Policy AL/RTW 19). Small areas associated with Reynolds Lane are proposed as LGS (AS_80, 216 and NS_2).
iii. Land to the west of the town, beyond ii above covering Caenwood and Smockham Farm and extending further south-west towards Rusthall. Includes mostly agricultural land and a significant	Green Belt GB BA10, SO1, RU2A, RU2B, RU3, SO1a and SO1b.	Area in Green Belt assessments with area S01a assessed as development site in Stage 3. SHELAA 30, 199, 100, 205 and 60 Parts of the agricultural land were assessed	The eastern part of Caenwood Farm (Green Belt Parcel S01a) is proposed for housing (approx. 100 dwellings) under Policy AL/RTW 5. Small areas at the southern tip are proposed as LGS (230 and 227)

Area	Status	Evidence	Conclusion
block of ancient woodland.		and rejected in the Site Options Analysis – Tunbridge Wells Borough Council Sports Hub – July 2020 [PS_026]	
iv. Land between Royal Tunbridge Wells and Rusthall south of iii above, which is Tunbridge Wells Golf Club.	Green Belt GB RU3	SHELAA 146, 456 and 22	No allocation for development; remains as Green Belt. Majority of site is proposed as LGS (227 and 231)
v. Land between Royal Tunbridge Wells and Rusthall south of iv above which includes Tunbridge Wells and Rusthall Commons, Hungershall Park, the Beacon, agricultural land and garden centre.	Common Land, Historic Park and Garden LWS Conservation Areas Green Belt GB BA8, TW11	SHELAA 280, 280, 42, 165 and 24 GB parcel TW 11 and BA8 Garden centre site assessed as development site in GB Stage 3	Part allocated as AL/RTW 14 (garden centre) allocated for expansion of existing use plus 25 to 30 dwellings
vi. Land west of Eridge Road, forming part of Spratsbrook Farm Agricultural land with listed farmhouse	Green Belt GB TW10 Site boundary overlaps with district/county boundary with Wealden District Council and East Sussex County Council.	SHELAA 137 GB parcel TW 10 assessed as development site in Stage 3 GB Study Subject to LVIA [CD 3.96b] TWBC and WDC have discussed this site – see SoCG section 2: (DtC Statement Appendix A10 Signed SoCG between TWBC and WDC [CD 3.132b(ii)] digital pages 174 to 210).	Eastern part (beyond AONB) proposed for housing (approx. 120 dwellings) under Policy AL/RTW 16 (Only on land in Tunbridge Wells Borough)

Area	Status	Evidence	Conclusion
vii. Land east of RTW Hawkenbury and Dunorlan Park	Green Belt GB BA6 and TW6a, 6b, and TW7 Historic Park and Garden, Conservation area, ancient woodland, recreation land and agricultural land.	SHELAA 434, 53, 255, 359, 400, 39 and DPC 5. GB parcel TW 6a assessed as development site in Stage 3 GB Study.	Part taken forward as AL/RTW 19 allocated for sports and recreation. Allotments on Halls Hole Road and Hawkenbury Recreation Ground are proposed as LGS (223 and 210).
viii. Land between Royal Tunbridge Wells and Pembury at Sandown Park on Pembury Road and Woodgate Corner Pembury bisected by the A21.	Green Belt GB TW5 PE6 Ancient woodland, agricultural land, garden centre, hotel and hospital. Straddles A21 corridor.	SHELAA (114, 411 and 99, LS13, 136, and 304	Part taken forward on the northside of the A21 as AL/PE 8 for a 76-bedspace care home. Land to the south west (similar to site 99) is proposed as LGS (217)
ix. Land Robingate Wood. Land within this parcel is Ancient Woodland and it abuts established development and a new housing development allocated by the SALP	Ancient Woodland and , LWS. GB BA2		Previously allocated through SALP as Publicly accessible green space and LWS associated with housing development to the west.

77. It can be seen that all areas beyond the town, whether or not they have Green Belt status, have been duly considered in the preparation of the Local Plan and areas found suitable for development have been taken forward accordingly.
78. The above mentioned locally specific 'Evidence' is in addition to the Sustainability Appraisal, that considered both a range of growth options, including ones with additional growth at Royal Tunbridge Wells (see the Council's SA Hearing Statement [\[TWLP/003\]](#) but also undertook a comparative appraisal of all sites, including the proposed new settlement, against consistent sustainability objectives.

79. As explained elsewhere, the Council has considered carefully the potential for development in the AONB, including for major development, but has concluded based on all the evidence that that it has allocated all suitable sites in and around Royal Tunbridge Wells and Southborough.
80. For completeness, land north-east of Royal Tunbridge Wells was included in the Issues and Options consultation document [[CD 3.6a](#)] as Growth Strategy 4, which was described as “*Development distribution focused around the A21, close to Royal Tunbridge Wells and Pembury, as a new 'growth corridor'*”. Even though wholly within the Green Belt and/or AONB, this was the most favoured option in the consultation; hence, careful consideration was given to locations within this area (the approximate extent of which is shown on page 41 of the Issues and Options document. [[CD 3.6a](#)].
81. There was a particularly strong case for employment development in this area, notably adjoining the existing North Farm ‘Key Employment Area’, which was recommended in the Economic Needs Study [[CD 3.87](#)] as it would be the most commercially attractive location for business growth. A further site for a business park has also been considered, which may be acceptable for longer-term employment needs, but cannot be justified at this time.
82. Other sites within this area which have been promoted for housing have been considered, including land at Mabledon and Nightingale Farm (as a mixed-use scheme) which was consulted upon at the Regulation 18 stage, but found to have significant impacts on Green Belt and/or AONB objectives.

Inspector’s Question 7: [re. extent of constrained areas and housing capacity outside of these]

The Development Strategy Topic Paper² refers to constraints to such as the Green Belt, the High Weald AONB and areas of flood risk. Which areas of the Borough are not constrained by flooding and/or the Green Belt and AONB? Why could housing needs not be met in these areas?

TWBC response to Question 7

Introduction

83. At a borough-wide scale, the extent of the flood risk areas, Green Belt and AONB are all shown on the Key Diagram in the Submission Local Plan [[CD 3.128](#)] as well as on Figure 3.
84. In simple area terms, the extent of these is, respectively:

Designation	Coverage
Flood Zone 3	5% of the area of the borough
Green Belt	22% of the area of the borough
High Weald AONB	69% of the area of the borough

85. The amount of land falling within at least one of these designations amounts to 74% of the borough. Of course, these figures do not differentiate between land that is already developed and undeveloped land.
86. The Council fully appreciated the need, in line with relevant NPPF policies, to give early consideration to developing beyond these areas.
87. At the same time, the Council did consider the scope for development in the AONB, conscious that national policy for AONBs does not aim to prevent development; but to ensure that it conserves or enhances its landscape and scenic beauty; also, that the need to firstly consider the cost of and scope for developing outside the designated area does not apply to non-major development.

² Core Document 3.126

Consideration

88. Land beyond the Green Belt and AONB and not subject to flood risk is the relatively narrow belt (on average about 2.2 km wide), running across the northern part of the borough from Paddock Wood in the west to the small village of Frittenden in the east. Of course, Paddock Wood is identified for substantial growth. Indeed, having regard to housing market conditions, it is planned to deliver as much housing as it realistically could do over the plan period.
89. The largest village outside the AONB or Green Belt is Horsmonden. As previously stated in relation to the Sustainability Appraisal (Matter 1, Issue 3, Questions 7 and 8) [Document Reference: [TWLP/003](#)], strategic expansion of Horsmonden was assessed through the SHELAA process and through the Sustainability Appraisal, but also not considered to be a reasonable option for a new/expanded settlement, as explained in Table 27 on pages 86-90 of the SA [[PS_013](#)]. The Council's SA Hearing Statement [[TWLP/003](#)] also provided (in its Appendix 2) a summary of the transport options available for each of these locations, as discussed at the relevant Hearing Session.
90. It is further highlighted that, in addition to considering the suitability of submitted sites, the Council directly contacted a number of landowners (specifically 16) to draw attention to the ongoing 'Call for Sites' process, to elicit further potential. However, as can be seen from the map of sites in the Sustainability Appraisal [[CD 3.130a](#)] (see page 203), there were few sites that were well related to the village (or to each other) to provide a sound basis for substantial growth. Moreover, there were a range of issues limiting growth, including the very rural character and high landscape sensitivity of the surrounding countryside, as identified in the Landscape Sensitivity Study [[CD 3.102c](#)] (at pages 68 – 92), which found that they had similar sensitivity to settlements in the AONB. Indeed, Horsmonden (and Sissinghurst) is within the High Weald National Character Area, as illustrated in the Landscape Character Assessment SPD (Figure 3 electronic page 8) [[PS_019](#)].
91. In terms of services, Horsmonden has a reasonable range of local services, as reflected by its position in Group D in the Settlement Role and Function Study [[CD 3.133](#)], but with relatively poor access to main towns for day-to-day needs, secondary education and employment, with no realistic prospect of significant improvements.

92. While the assessment of sites at Horsmonden through the SHELAA (see [CD 3.77i](#)) shows that it does not have the ability to accommodate substantial growth - due mainly to landscape sensitivity and poor connectivity reasons – some areas around this medium-sized village have been identified for allocation, which together provide for a relatively high number of additional dwellings (240-320 net additional homes) as well as some community facilities. In fact, this amounts to some 38.6%-51.4% increase³ in housing stock over the plan period, aside from any smaller permissions or windfall sites.
93. Although not in the AONB, Sissinghurst is fairly hard up to the AONB boundary, being adjacent to the southern side the village centre. Consideration has been given to the growth of Sissinghurst; the Draft Local Plan consulted on several sites in the village. However, four of these have not been pursued into subsequent iterations of the Local Plan, due mainly to accessibility issues. This includes two sites on the opposite (western) side of the A229 from the village and two adjacent, more centrally situated sites. It is notable that a scheme for 42 dwellings on the larger of these sites, covered by Policy CRS 13 in the Draft Local Plan (DLP), has recently been the subject of an appeal, which was dismissed on highway safety grounds.⁴ The SHELAA presents the assessment of all submitted sites at Sissinghurst at Core Document [CD 3.77f](#).
94. There are currently two allocations in the Submission Local Plan (SLP). One of these follows advice from Kent County Council, as the local education authority, that land previously safeguarded for school expansion in the Draft Local Plan (DLP Policy CRS 17) is not required. It is now proposed in the Submission Local Plan for approximately 18 dwellings. (SLP Policy AL/CRS 7).
95. Frittenden is not only limited in terms of its facilities and services, as evidenced by its low ranking in the Settlement Role and Function Study [[CD 3.133](#)], but is also poorly related, and connected, to higher order centres. Moreover, while it was considered for larger growth, only one site in the village was submitted – which is a proposed allocation in the SLP.

³ See estimate of current dwelling stock at **Appendix 3**

⁴ Application ref. 19/00308/FULL; Appeal Ref: APP/M2270/W/20/3265584 for Land to the west of Mill Lane and north of Sissinghurst Road, Sissinghurst

96. While the large majority of Benenden parish is within the High Weald AONB, the East End area lies beyond it; here, two essentially brownfield sites at Benenden Hospital are identified as capable of contributing towards housing.
97. Site assessments for all sites submitted for consideration through the Local Plan process can be viewed in the most recent SHELAA [[CD 3.77a](#)].

Conclusion

98. A relatively high proportion of growth is being accommodated in the area not designated as Green Belt or AONB, this being substantially due to the strategic growth of Paddock Wood, while further development here would not amount to sustainable development as required by the NPPF.

Inspector's Question 8: [re. housing potential outside of the Green Belt and AONB]

Could housing needs be met in a way that did not require land to be removed from the Green Belt and/or require development in the AONB?

TWBC response to Question 8

Introduction

99. This question follows on from the previous one and the responses may be read together. In essence, the opportunities for sustainable development outside of the Green Belt and the High Weald AONB are already being taken.
100. For context, the total number of dwellings proposed on allocations within the High Weald AONB is approximately 1,126 dwellings⁵, while the capacity of sites in the Green Belt is some 4,266 dwellings⁶. Allowing for some sites (AL/PE 1-3, AL/PE 7 and AL/SP 1) being covered by both designations having a combined capacity of some 261 dwellings, this means that some 5,131 dwellings are proposed within these designations. This can be seen as a significant contribution towards the total housing supply from all sources (planning permissions, windfall sites and allocations) over the plan period of 13,059-13,444 dwellings⁷, equivalent to some 38.2% to 39.2%.
101. Of course, the developments within the respective designated areas flow from assessments, via the SHELAA and the SA, of the suitability of sites for sustainable development.
102. It is clear that, without some Green Belt and AONB sites, there would be substantial unmet local need for housing, including affordable housing.
103. In relation to the AONB, it is noted that the above dwelling figures relate to all proposed allocations, most of which are non-major developments. Also, regard is given to the borough's AONB coverage and the need to support its communities.

⁵ Taken from Appendix 2 of the Council's response to Matter 2, Issue 1: Housing Needs and the Housing Requirement [TWLP/011]

⁶ Taken from Table 1 in response to Matter 4, Issue 1, Question 2 [TWLP/018]

⁷ Taken from SLP paragraph 4.53 on page 43

104. Similarly, for the Green Belt, regard is given to the fact that it largely envelops the borough's main urban area and extends on the western edge of the borough's second largest town, Paddock Wood.
105. Hence, it is concluded that it is not possible to meet development needs without proposing development in the current Green Belt or within the High Weald AONB and, furthermore, that it would not be compatible with achieving sustainable development.
106. In saying this and for the avoidance of doubt, it is the Council's view that the proposed developments both in the AONB and in the Green Belt pass the relevant NPPF policy tests to determine appropriateness, including having regard to housing needs, as set out in the Development Strategy Topic Paper [\[CD 3.126\]](#), at Sections H and I respectively.

Inspector's Question 9: [re. impacts of Green Belt, AONB and flood risk on development capacity]

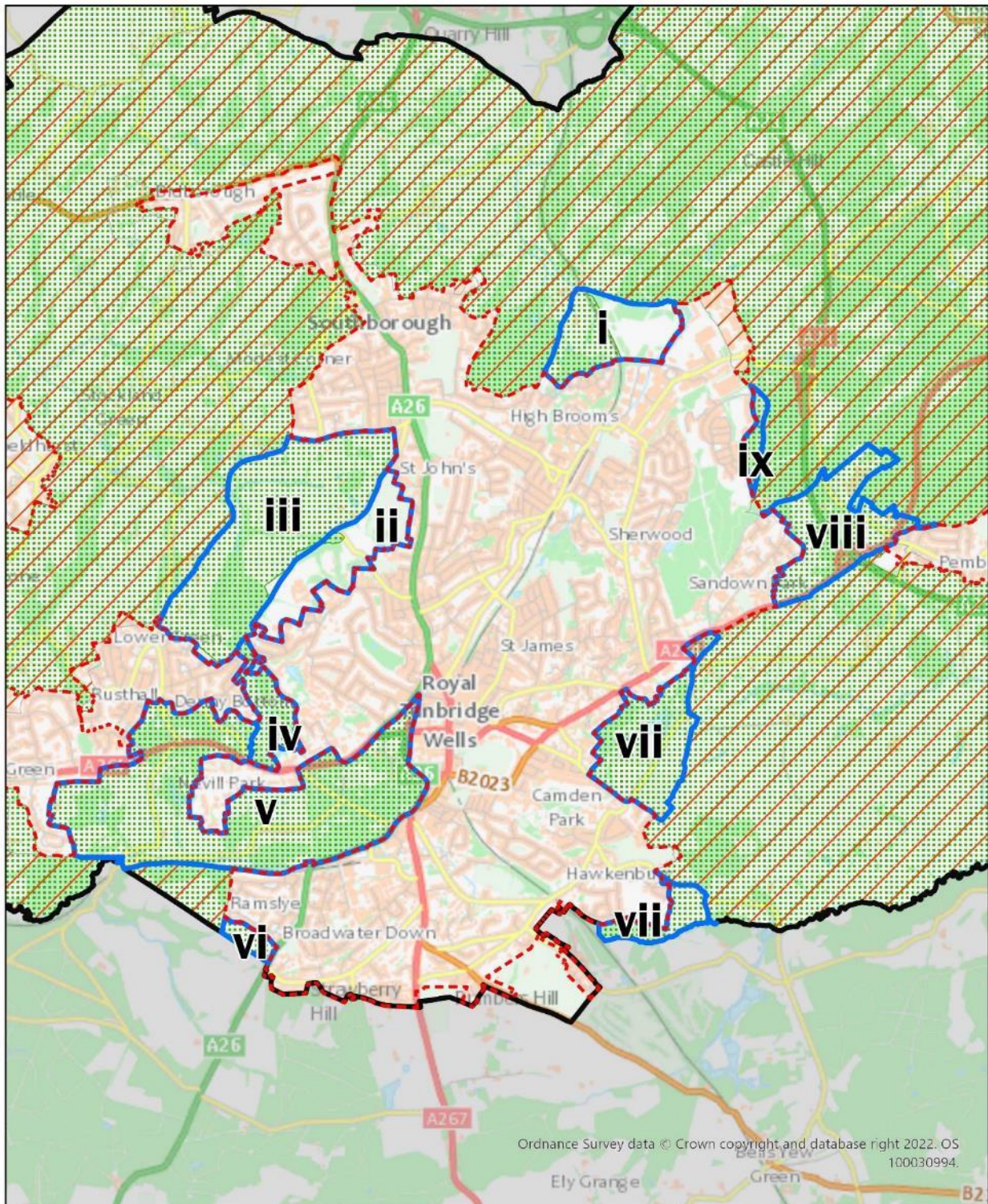
Do policies relating to the Green Belt, the High Weald AONB and/or flood risk provide a strong reason for restricting the scale, type and distribution of development in Tunbridge Wells?

TWBC response to Question 9

107. For general reference, the Development Constraints Study, 2016 [[CD 3.32](#)] provides an initial overview and mapping of the strategic constraints to development in the borough. This includes regard to Green Belt, AONB and flood risk. These are shown on Figures 6 and 7 on the last pages.
108. As suggested by the Inspector in his note on Stage 2 hearings, this question is addressed in the Council's response to Question 5 under Matter 2, Issue 1 [TWLP/011].

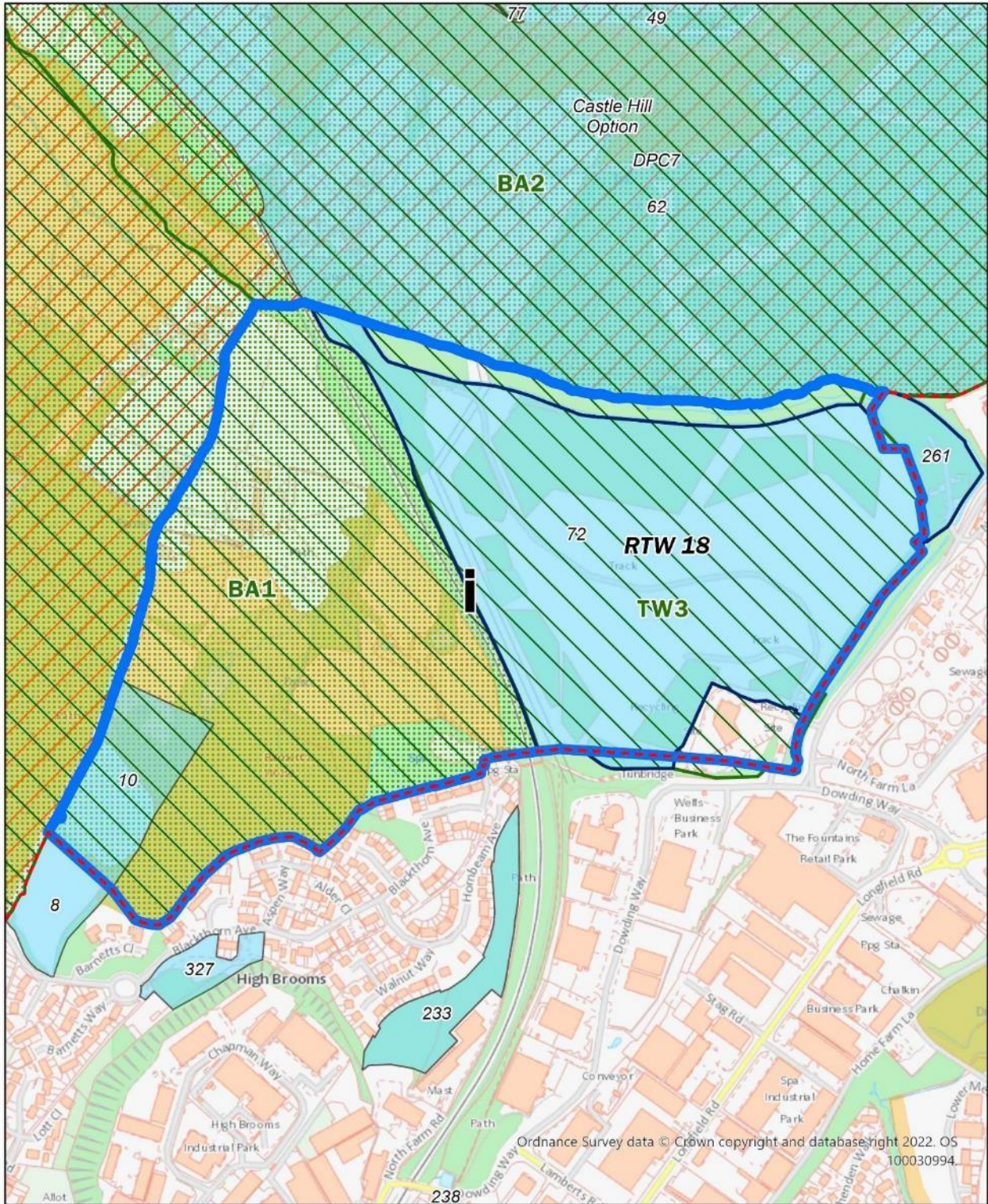
Appendices

Appendix 1: Maps relating to areas in Table 1

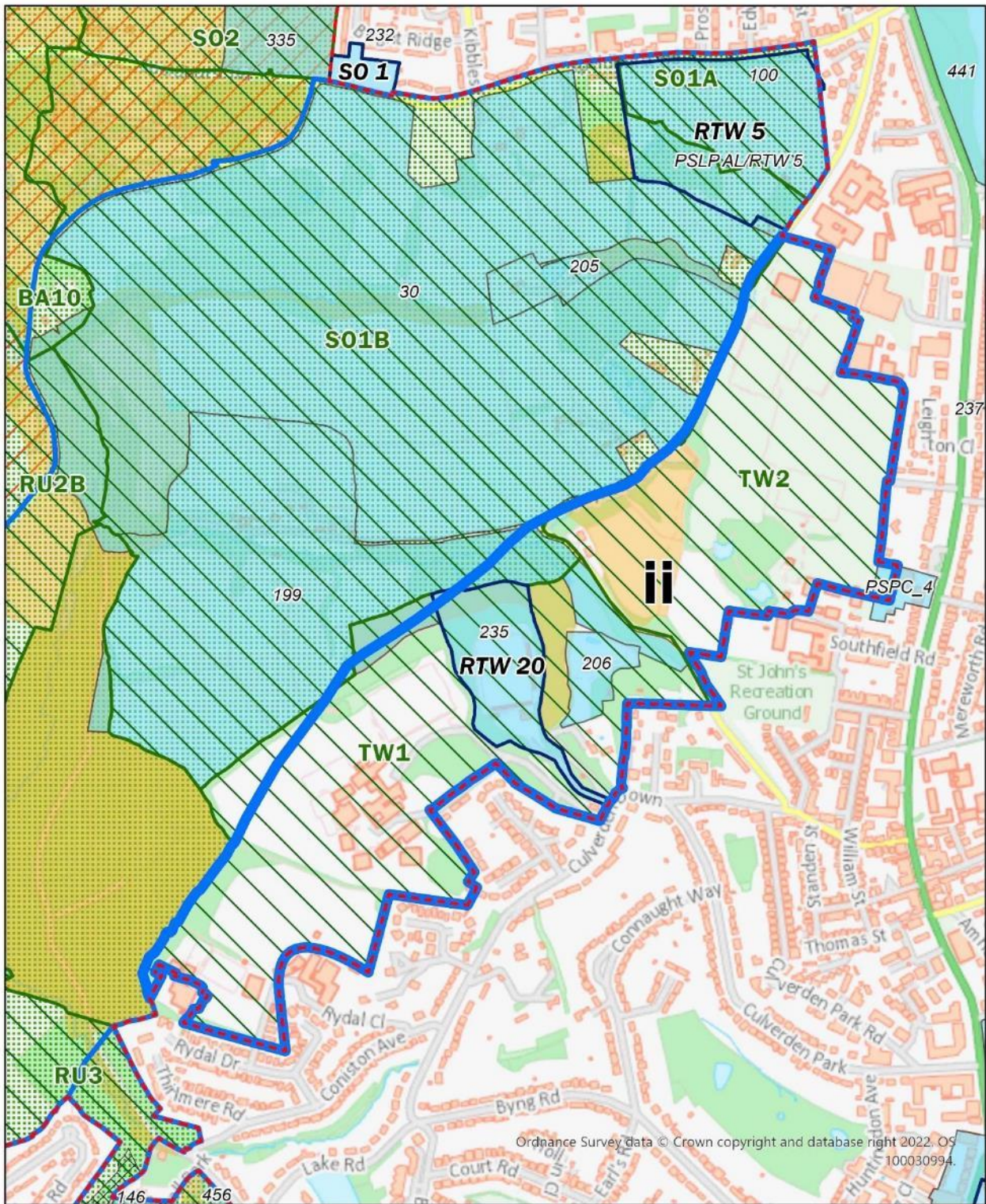


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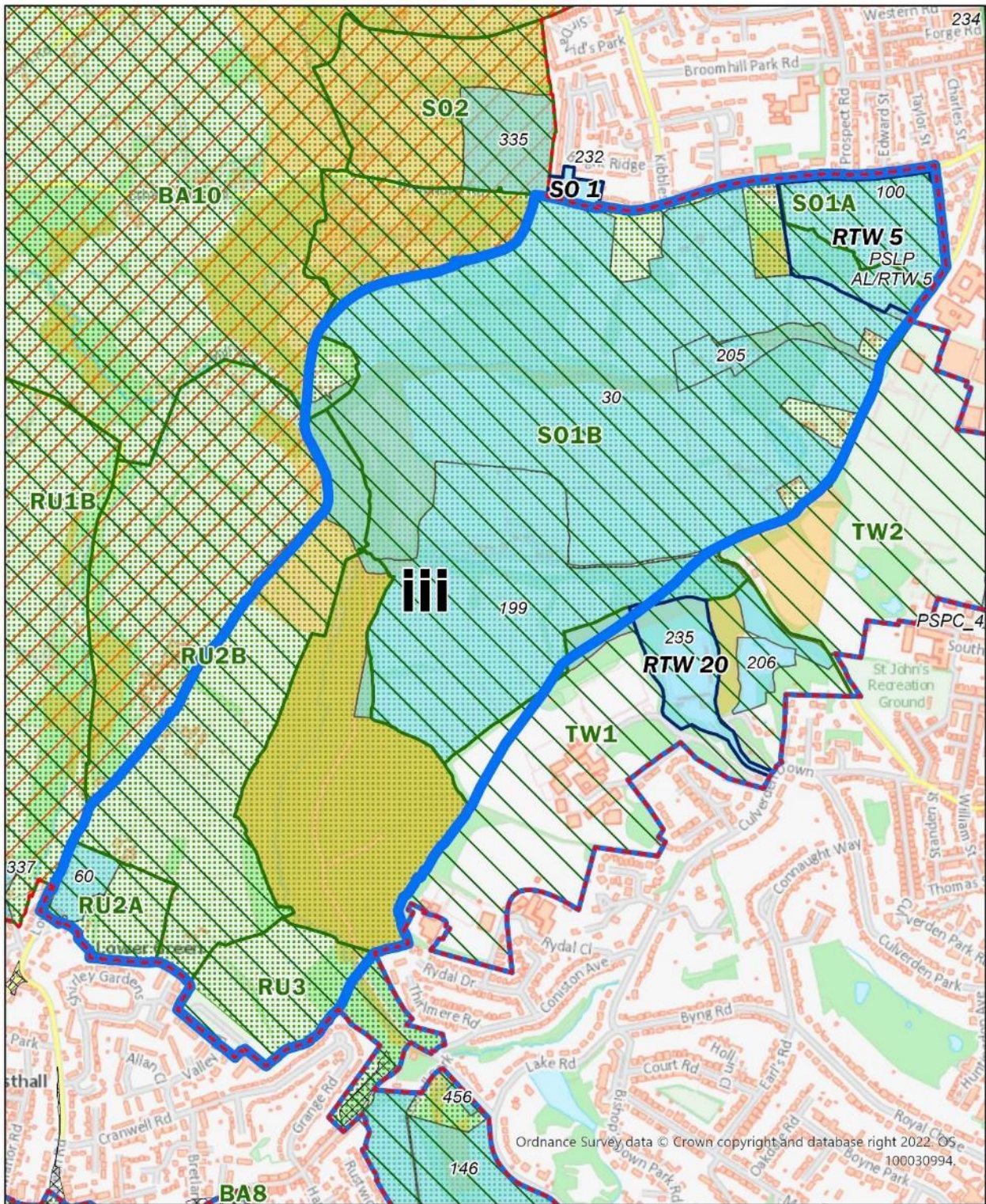
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LBD	Green Belt			
AONB				



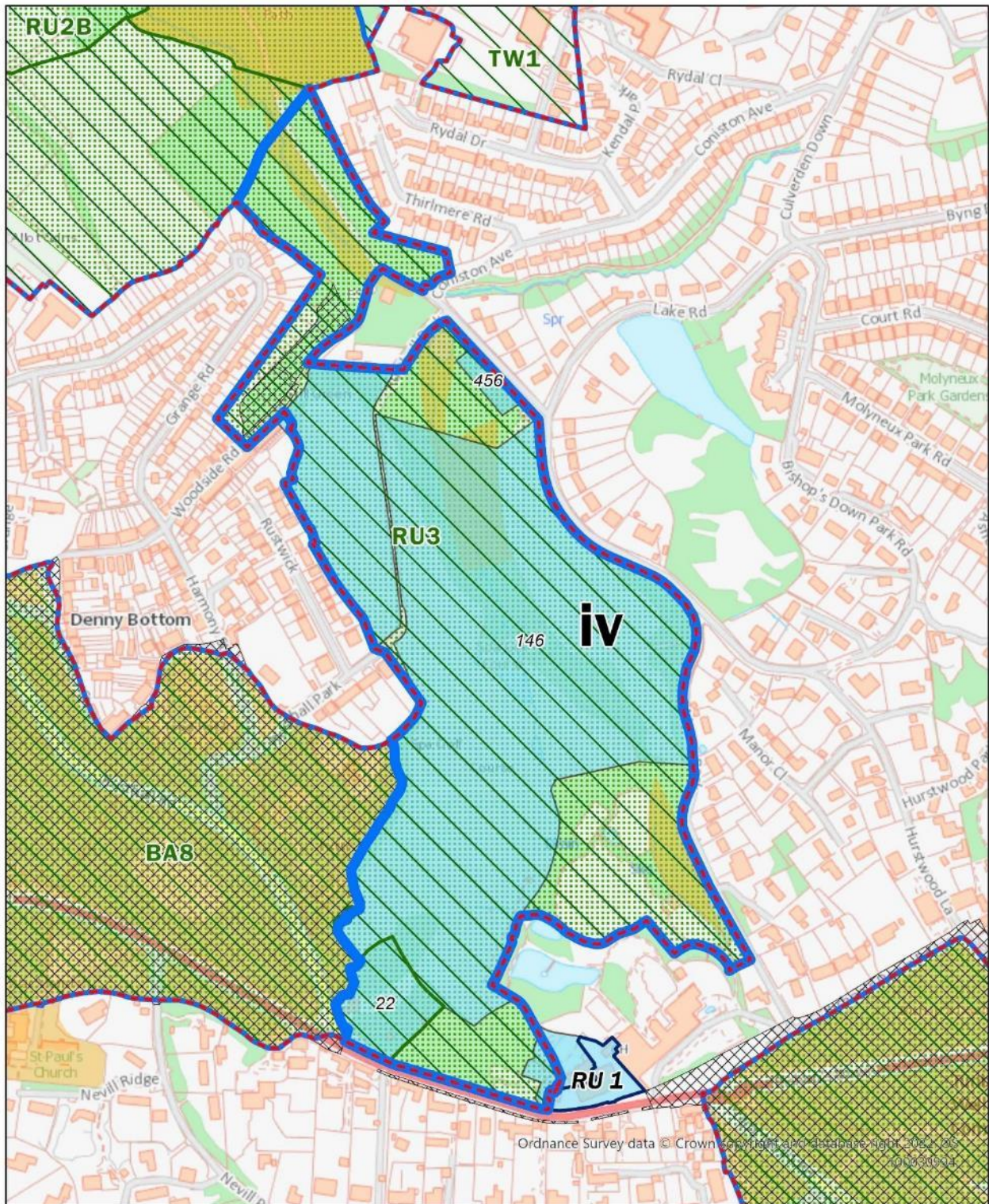
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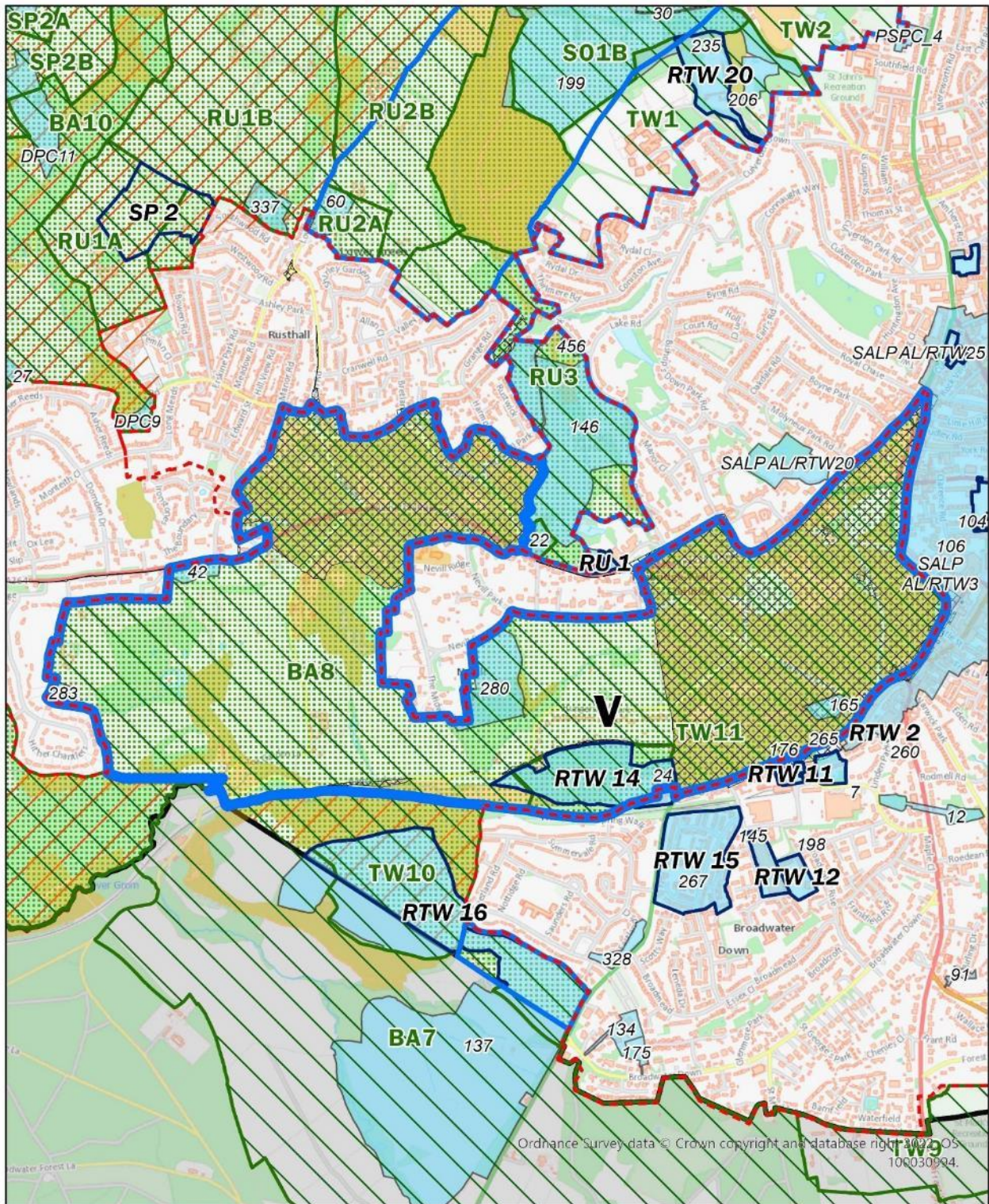
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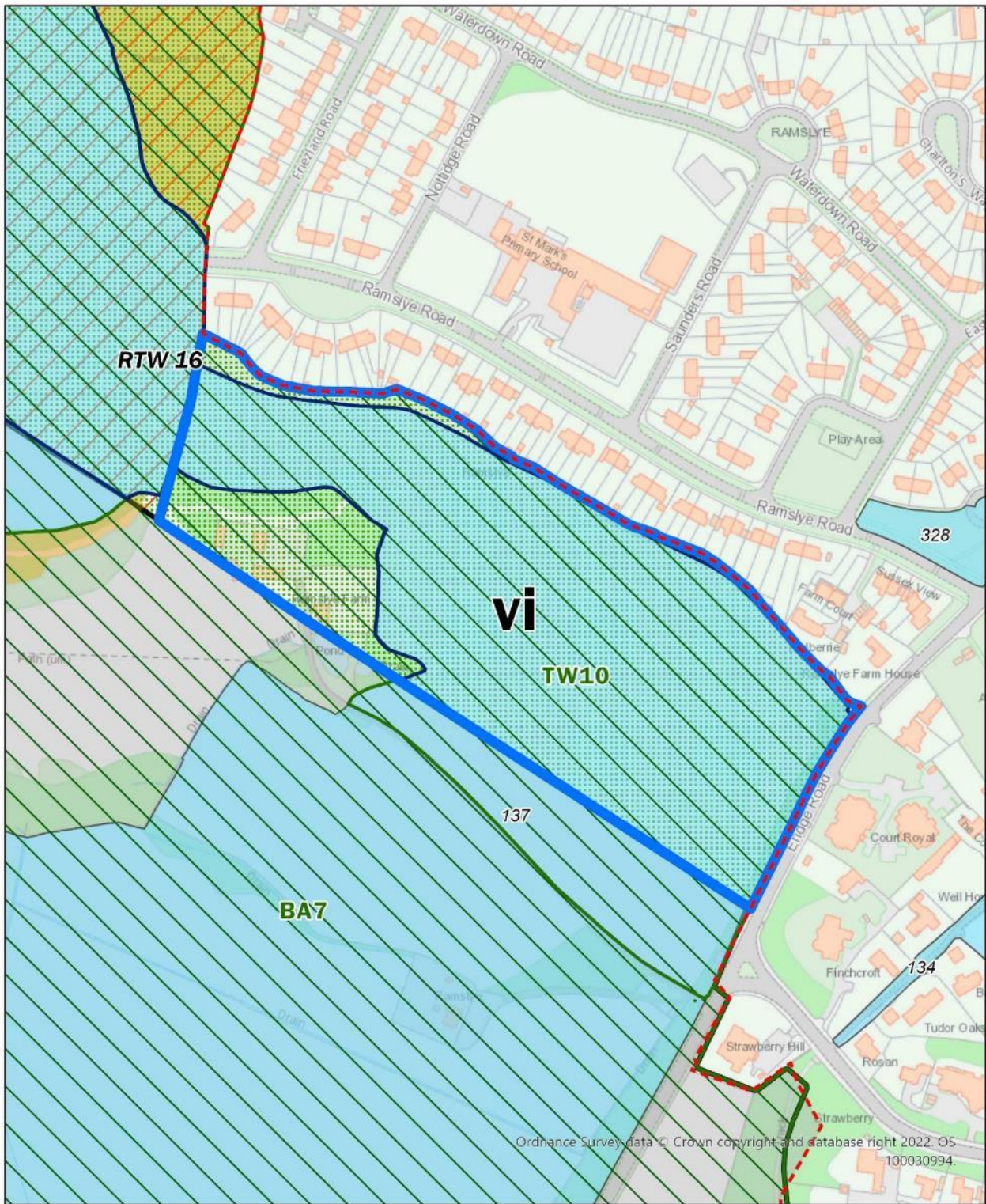
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LBD	Allocation Boundary	SHELAA Sites	Borough Boundary				



Area Number: IV						Scale: 1:5,000	
RTW Areas	Green Belt (Stage 2)	Environmental Constraints: - Ancient Woodland - Historic Parks and Gardens - Local Wildlife Sites - Local Nature Reserves		Label Key: i = Area Number RTW 1 = Site Allocation TW1 = Green Belt Stage 2 100 = SHELAA Site Number			
LBD	Allocation Boundary	SHELAA Sites					
AONB	Borough Boundary	Common Land/Village Greens					
Green Belt							

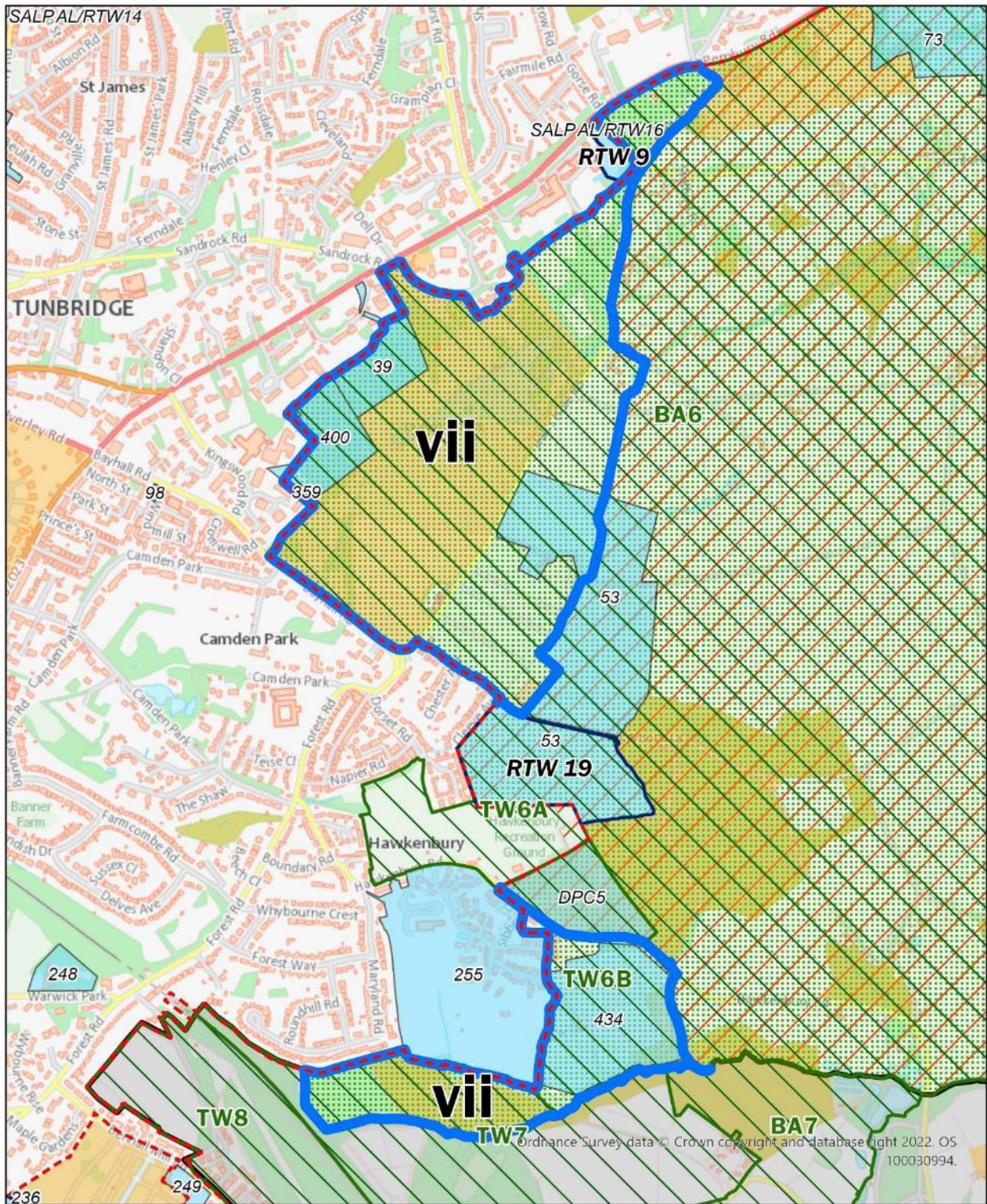


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LBD	Allocation Boundary	SHELAA Sites	Borough Boundary				

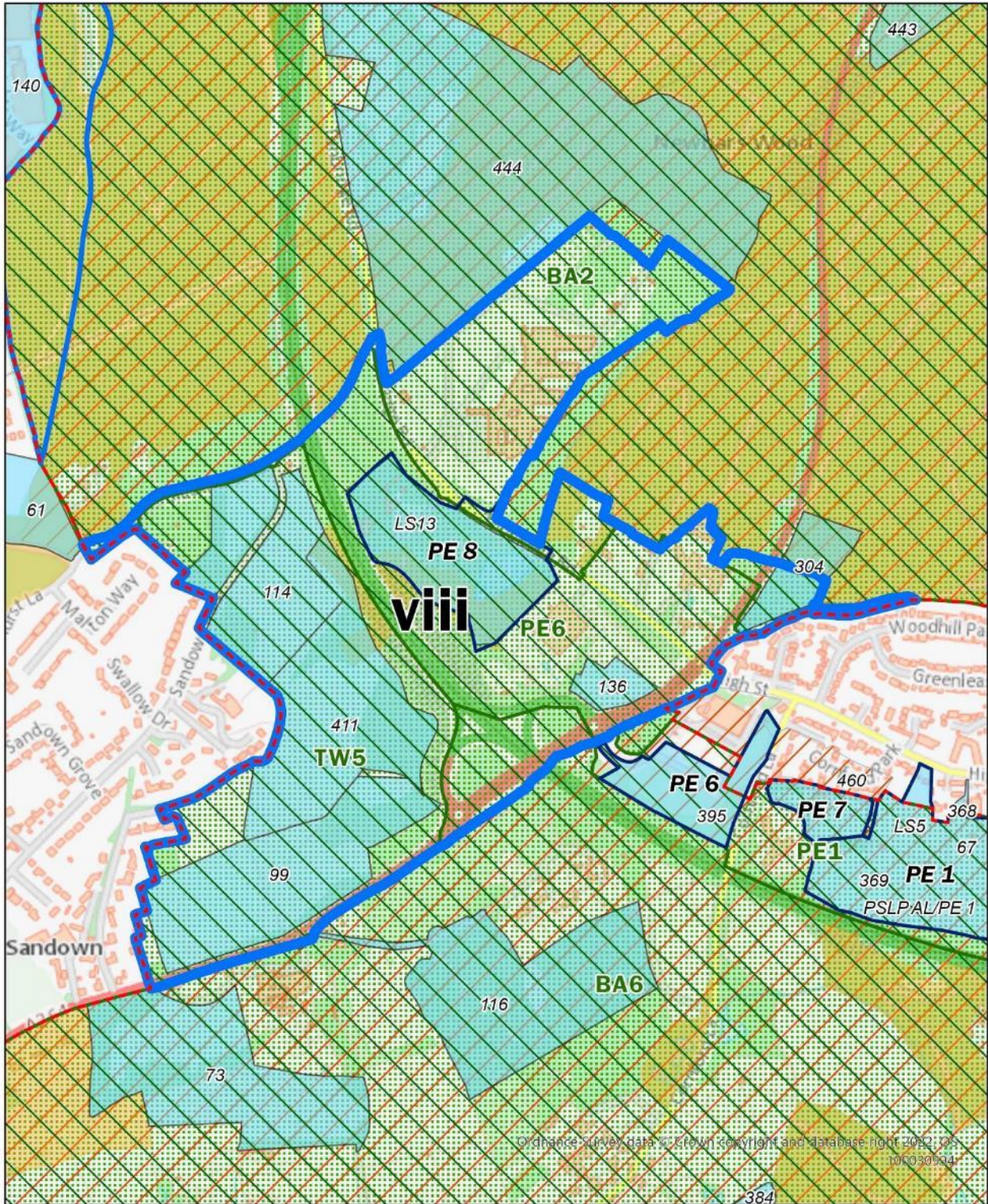


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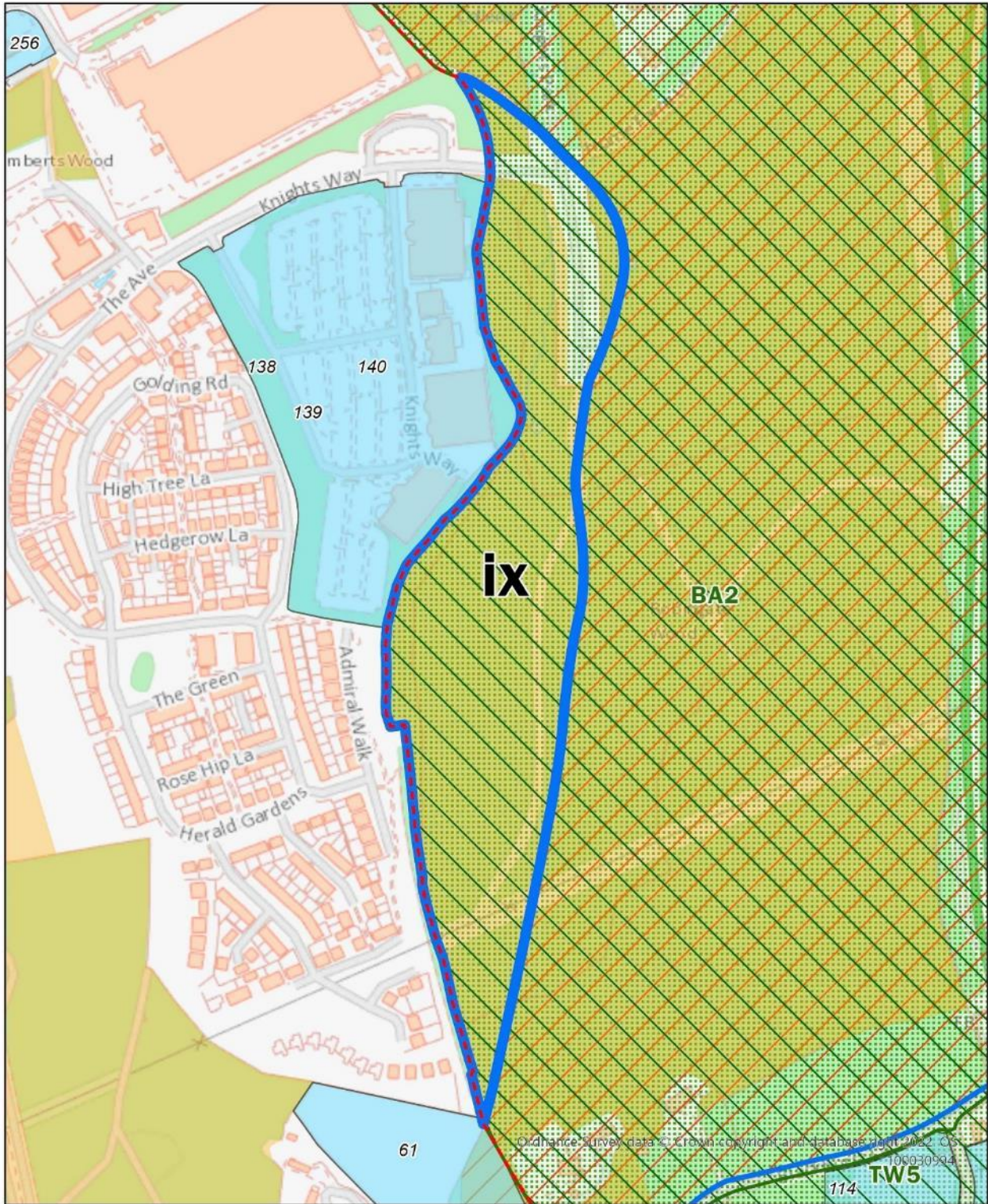
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LBD	Allocation Boundary	SHELAA Sites					
AONB	Borough Boundary	Common Land/Village Greens					



Area Number: VII						Scale: 1:11,000	
RTW Areas	Green Belt (Stage 2)	Environmental Constraints: - Ancient Woodland - Historic Parks and Gardens - Local Wildlife Sites - Local Nature Reserves		Label Key: i = Area Number RTW 1 = Site Allocation TW1 = Green Belt Stage 2 100 = SHELAA Site Number			
LBD	Allocation Boundary	Common Land/Village Greens					
AONB	SHELAA Sites						
Green Belt	Borough Boundary						



Area Number: VIII						Scale: 1:8,000	
RTW Areas LBD AONB Green Belt	Green Belt (Stage 2) Allocation Boundary SHELAA Sites Borough Boundary	Environmental Constraints: - Ancient Woodland - Historic Parks and Gardens - Local Wildlife Sites - Local Nature Reserves Common Land/Village Greens	Label Key: i = Area Number RTW 1 = Site Allocation TW1 = Green Belt Stage 2 100 = SHELAA Site Number				



Area Number: IX						Scale: 1:4,000		
RTW Areas	Green Belt (Stage 2)	Environmental Constraints: - Ancient Woodland - Historic Parks and Gardens - Local Wildlife Sites - Local Nature Reserves		Label Key: i = Area Number RTW 1 = Site Allocation TW1 = Green Belt Stage 2 100 = SHELAA Site Number				
LBD	Allocation Boundary	Common Land/Village Greens						
AONB	SHELAA Sites	Borough Boundary						
Green Belt								

Appendix 2: AONB and Green Belt in the vicinity of Royal Tunbridge Wells

