

# Tunbridge Wells Borough



**Distribution of Development Topic Paper for  
Draft Local Plan – Regulation 18 Consultation  
September 2019**

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## 1. Introduction

- 1.1 This Topic Paper explains the background to the proposed 'Development Strategy' in Section 4 of the Draft Local Plan.
- 1.2 It sets the context for the future development of the borough and shows how the proposed development strategy has evolved as the consequence of an iterative process, drawing on consultation responses to the earlier 'Issues and Options' document, the outcomes of a range of studies and reports, specific site assessments (under the Strategic Housing and Economic Land Availability Assessment), due regard to relevant national policies and guidance and recommendations from the Sustainability Appraisal (SA) of the Draft Local Plan.
- 1.3 Particular consideration has been given to the potential to accommodate development needs within the borough, notably for housing while also, where appropriate, prioritising opportunities for economic growth, without undue impacts on the functioning and purposes of the Green Belt and the defining characteristics of the High Weald Area of Outstanding Natural Beauty (AONB), and without exacerbating flood risk. Connectivity and the capacity of infrastructure, including transport, utilities, schools, and other community services/facilities has also contributed to the preparation of the proposed strategy, including assessments of future infrastructure requirements generated by proposed development, and how these will be delivered.
- 1.4 This Topic Paper should be read in conjunction with other evidence studies and documentation (e.g. the Infrastructure Delivery Plan, various other Topic Papers, etc) produced to inform and support the Draft Local Plan. These are cross referenced at appropriate points.

## 2. Settlement pattern

- 2.1 In 2017, the population of the borough was around 118,100<sup>1</sup>, with 48,750 dwellings.
- 2.2 Royal Tunbridge Wells and Southborough form the Main Urban Area within the borough, with the former having the principal retail centre. Southborough has a separate, smaller town centre, as well as local 'neighbourhood centres' at High Brooms and north Southborough.
- 2.3 Paddock Wood benefits from good transport links and higher order facilities, such as a secondary school and sports centre. There is a large employment area to the north of the railway line. Cranbrook is an attractive, vibrant rural town located within the High Weald AONB, benefitting from a range of facilities. Hawkhurst is also located within the High Weald AONB and provides local services for the immediate rural area. The borough also has a variety of village settlements and a number of hamlets and other more remote clusters of buildings and farmsteads dispersed across the borough.
- 2.4 The adopted Core Strategy (June 2010)<sup>2</sup> identified the following settlement hierarchy:

<i>Main Urban Area</i>	<i>Royal Tunbridge Wells, Southborough</i>
<i>Small Rural Towns</i>	<i>Cranbrook, Paddock Wood, Hawkhurst (Highgate)</i>
<i>Villages</i>	<i>Benenden, Bidborough, Brenchley, Five Oak Green, Frittenden, Goudhurst, Hawkhurst (The Moor), Horsmonden, Iden Green, Kilndown, Lamberhurst, Langton Green, Matfield, Pembury, Sandhurst, Sissinghurst, Speldhurst</i>

- 2.5 It is noted that these settlements correspond with those towns and villages that have 'Limits to Built Development' (LBDs)<sup>3</sup> in the current Development Plan (i.e. Local Plan (2006), Core Strategy (2010) and Site Allocations Local Plan (2016)). LBDs were established in the Council's 1996 Local Plan, carried forward into the 2006 Local Plan and, for settlements with new allocations, updated during the Site Allocations Local Plan (2016) (SALP). They essentially differentiate between the main built up confines of settlements and the more rural fringe and countryside areas that lay beyond them. Local planning policies are generally supportive towards new development inside LBDs, but more restrictive to development outside of them, although there are some exceptions to meet local social and economic needs.

<sup>1</sup> ONS Mid-year estimate 2017

<sup>2</sup> <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/development-plan-documents/core-strategy>

<sup>3</sup> Rusthall is in the LBD for Langton Green; Bidborough is included within the LBD for RTW & Southborough. There are also LBDs covering two employment areas at Brook Farm and Gill's Green.

- 2.6 To inform the new Local Plan, the Council prepared a 'Settlement Role and Function Study'<sup>4</sup> in 2017. This provides information about larger settlements in the borough and the services and facilities they provide<sup>5</sup>. This not only updates the understanding of settlement pattern and hierarchy, but also provides an indication of each settlement's level of sustainability.
- 2.7 The findings of this Study are that the 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. Based on the scores and evidence collected in this Study, possible groupings of settlements in terms of the existing services and facilities that they provide have been identified as: *larger sized - higher scoring settlements*; *slightly smaller - medium scoring settlements* and *smaller – lower scoring settlements*. The table below shows suggested settlement groupings presented in the Issues and Options consultation document (2017) on which views were sought.

Grouping	Settlement
Main Urban Area	Royal Tunbridge Wells and Southborough
Group A	Cranbrook, Paddock Wood, Hawkhurst (Highgate and The Moor), Rusthall, Pembury
Group B	Goudhurst, Brenchley, Lamberhurst, Five Oak Green
Group C	Speldhurst, Sandhurst, Benenden, Langton Green, Horsmonden, Sissinghurst
Group D	Frittenden, Bidborough, Matfield
Group E <sup>6</sup>	Iden Green, Kilndown

Table 1: Groupings of settlements in Issues and Options Document (2017)

- 2.8 These groupings give an indication of the level of the relative sustainability of settlements, which can be a starting point for considering growth potential. However, it should be noted that other factors, such as transport, employment/economic, environmental, landscape, heritage and flooding considerations also need to be assessed to determine potential to accommodate growth. Hence, 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 that provides new infrastructure/services/employment opportunities.

<sup>4</sup> [https://beta.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0005/291731/Settlement-Role-and-Function-Study\\_Feb-2017.compressed.pdf](https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0005/291731/Settlement-Role-and-Function-Study_Feb-2017.compressed.pdf)

<sup>5</sup> The Study focuses on settlements that have 'Limits to Built Development' (LBD) defined by current planning policies, although Royal Tunbridge Wells (RTW) and Southborough are not included given their status/definition as the main urban area of the borough.

<sup>6</sup> Note that further work has concluded that the settlements of Iden Green and Kilndown are unsuitable for further development as they have limited key facilities and bus services; hence, their LBDs are proposed to be removed. Further details to support this approach are provided in the Limits to Built Development Topic Paper.

### 3. Development constraints

- 3.1 A 'Development Constraints Study', published in October 2016<sup>7</sup>, looks at the existing evidence for environmental factors and designations in terms of the potential to constrain the ability to accommodate development within the borough, taking into account the provisions of the National Planning Policy Framework (NPPF). It looks at Green Belt, environmental capacity, and transportation.

#### Metropolitan Green Belt

- 3.2 The Metropolitan Green Belt covers 22% of Tunbridge Wells borough, as shown on Figure 1 below.

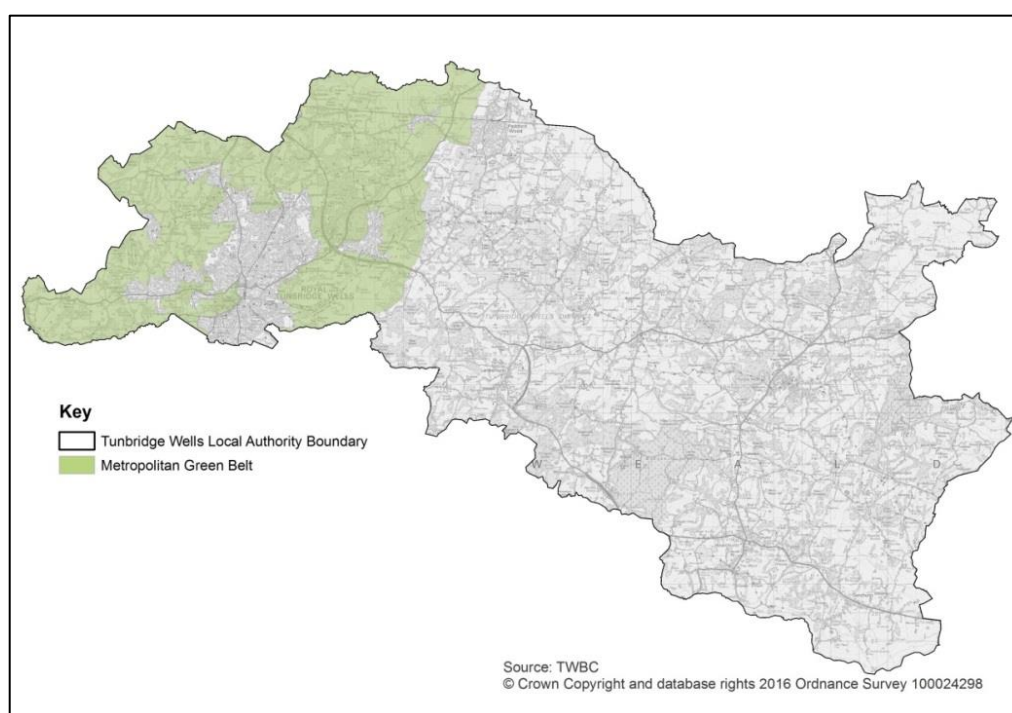


Figure 1 Metropolitan Green Belt

- 3.3 There are five well-established purposes of the Green Belt, set out in the NPPF at para 134<sup>8</sup>:
- to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

<sup>7</sup> [https://beta.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0004/291820/Development-Constraints-Study\\_October-2016.compressed.pdf](https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0004/291820/Development-Constraints-Study_October-2016.compressed.pdf)

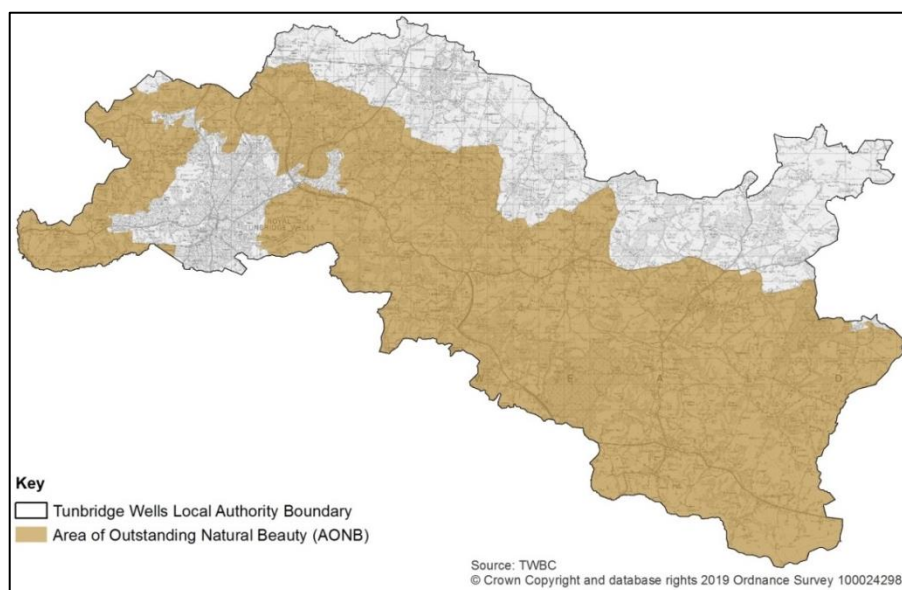
<sup>8</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)



- 3.4 National policy (NPPF para 135) states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The preparation of new strategic policies (such as in the new Local Plan), is the appropriate mechanism for undertaking Green Belt reviews.
- 3.5 On this basis, there is a clear presumption that the Green Belt should remain fundamentally intact, but that it is still necessary for the Council to undertake a study that assesses the current Green Belt boundaries against their purposes and functions. At the same time, the removal of land from the Green Belt may only be considered where other reasonable options for meeting development needs have been fully explored, as set out in para 137 of the NPPF. This includes making as much use as possible of brownfield land and highly accessible sites, as well as exploring the potential for neighbouring authorities to meet some of the identified need for development.
- 3.6 The Council commissioned Land Use Consultants (LUC) to carry out a 'Green Belt Strategic Study' to inform the Local Plan. LUC's initial report was published in November 2016. By establishing the extent to which areas of Green Belt fulfil the purposes for which it was designated, this study informed further work on whether any of the borough's Green Belt could be amended. It identified 33 parcels and 10 broad areas as being areas in which there is a possibility that land may not make a strong contribution to Green Belt purposes. These are further assessed in the 'Stage Two' Green Belt Study report.

#### High Weald AONB

- 3.7 Some 70% of the borough lies within the High Weald AONB, as shown on Figure 2 below.



**Figure 2 Area of Outstanding Natural Beauty**

- 3.8 AONBs, alongside National Parks, represent the country's finest landscapes and have the highest status of protection in relation to conserving and enhancing their landscape and scenic beauty.
- 3.9 This status is reflected in the NPPF at para 172 which sets out that “*great weight*” should be given to conserving their landscape and scenic beauty. Moreover, it states that “*the scale and extent of development within these designated areas should be limited*” and that there is a corresponding presumption against major development in them other than in exceptional circumstances, and where it can be demonstrated that the development is in the national interest.
- 3.10 The NPPF further advises on the considerations that should form part of an assessment to meet these strict tests.
- 3.11 While not ruling out sensitively designed development in or on the edge of settlements within the AONB as part of a Local Plan strategy, it is evident that a new settlement, or strategic-scale urban extensions, would almost certainly be inappropriate under this national policy position. Indeed, the statutory duty to have regard to the conservation and enhancement of the AONB is likely to limit its capacity to absorb new development satisfactorily (para 172 NPPF). The findings of detailed work looking at the impact that the development of individual sites would have on the essential characteristics of the AONB is presented in Section 6G.

#### Nature Conservation designations

- 3.12 The borough has a number of, or is close to, areas of ecological importance, which are illustrated on Figure 3 below.

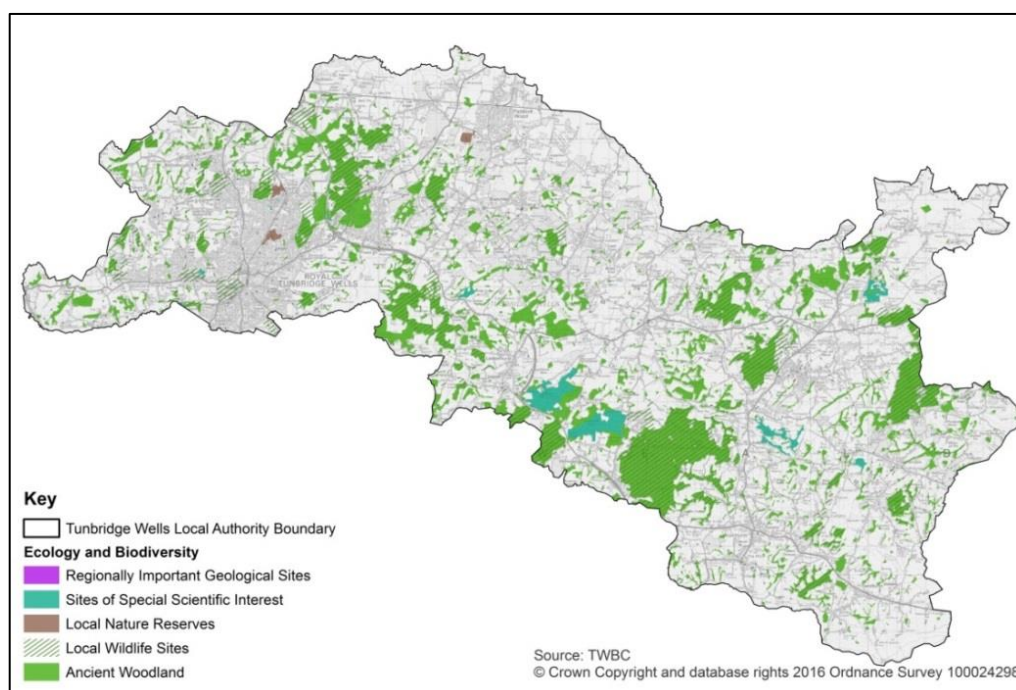


Figure 3 Nature Conservation designations



- 3.13 While there are no European sites for nature conservation actually within the borough, Ashdown Forest is located to the south west of the borough (within Wealden District Council administrative area), and is designated as both a Special Area of Conservation (SAC) and Special Protection Area (SPA). In relation to the SPA, the Council is, in agreement with other local planning authorities and Natural England, applying appropriate mitigation measures to any new residential development within a 7km buffer zone around the Forest, as set out in the Habitat Regulation Assessment for the Draft Local Plan<sup>9</sup>. This is to offset the potential impact of additional recreational pressures on its sensitive habitats. Consideration also needs to be given to the ecological impact of additional traffic movements upon air quality across the SAC.
- 3.14 There are 10 nationally important Sites of Special Scientific Interest (SSSI) in the borough, as well as substantial areas of irreplaceable Ancient Woodland (covering some 16% of the borough), largely associated with the High Weald AONB, of which it is a key characteristic. Additionally, there are approximately 60 Local Wildlife Sites (approximately 11% of the borough) five Local Nature Reserves and one Regionally Important Geological Site, at Scotney Castle.
- 3.15 National policy supports legislative provisions in severely restricting development in, or otherwise likely to have an adverse impact on, sites that carry an international or national designation (including SAC, SPA and SSSIs; para 170 – 173 of the NPPF). Similar restrictions also apply to Ancient Woodland. Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves, which are all locally designated, must also be given appropriate consideration by the Local Planning Authority.

#### Heritage designations

- 3.16 There are a number of archaeological and heritage sites within the borough. These include:
- 45 Historic Parks and Gardens;
  - 25 Conservation Areas;
  - 11 Scheduled Ancient Monuments;
  - Approximately 3,000 listed buildings.
- 3.17 Designated heritage assets (and other heritage assets of archaeological interest) are recognised in the NPPF (Para 11, note 6) as potential bases for not meeting the full development needs of an area.

#### Areas of flood risk

- 3.18 There is policy emphasis in the NPPF (para 155) to steer development, notably housing, away from areas with higher flood risk, defined as being Flood Zone 3. Nearly 7% of the borough is in Flood Zone 3, these areas being mapped on Figure 4 below.

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<sup>9</sup> [https://beta.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0006/291822/Interim-HRA.pdf](https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0006/291822/Interim-HRA.pdf)

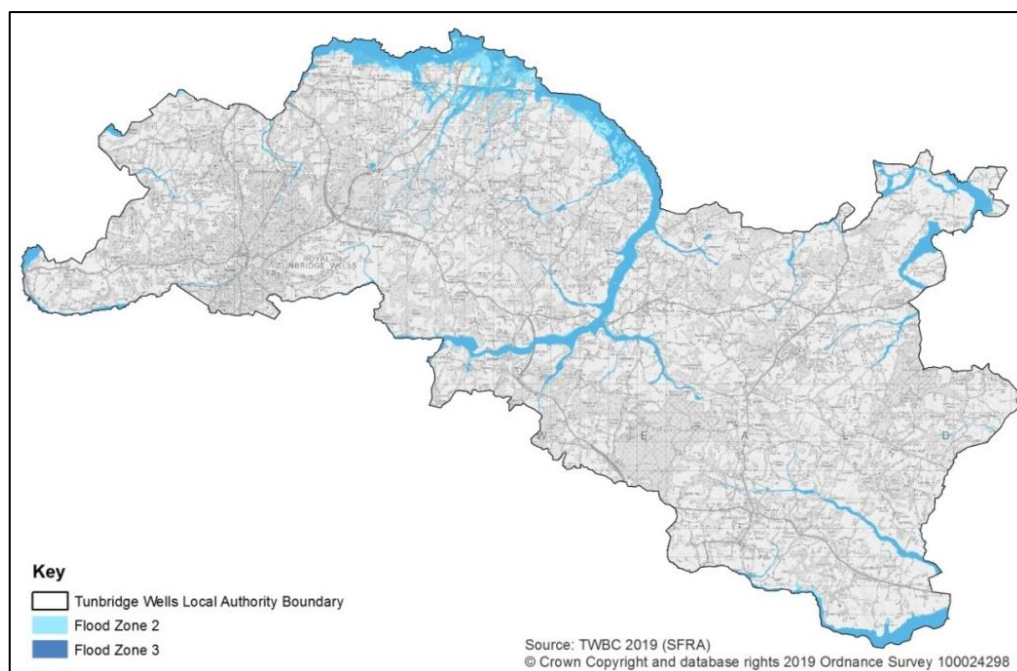


Figure 4 Flood Risk Zones (taken from SFRA)<sup>10</sup>

<sup>10</sup> <https://beta.tunbridgewells.gov.uk/local-plan/evidence/resources/environment-and-landscape/strategic-flood-risk-assessment>

## 4. Development needs

### Housing

- 4.1 National planning policy, as set out in paragraphs 60 and 61 of the NPPF, requires that local planning authorities should assess the housing needs within their areas in terms of both the amount and types of housing needed, while paragraph 67 expects them to have a clear understanding of the amount and location of land that is available for housing.
- 4.2 Based on submission of the Local Plan in 2020, the objectively assessed housing need for the borough over the plan period to 2036 is confirmed as 13,560 dwellings (678 per year), identified by the standard method (and based on 2014 projections) as required by the NPPF. The basis of this housing need target, together with assessments of the housing needs of particular groups, is set out in the Housing Needs Assessment Topic Paper<sup>11</sup>. This figure does not include any unmet need from other areas.
- 4.3 The outstanding housing need, as at 1 April 2019, taking account of housing completions April 2016 to March 2019, extant planning permissions at 1 April 2019, outstanding site allocations from the Site Allocations Local Plan 2016, and a windfall allowance, is set out in the Housing Supply and Trajectory Topic Paper.
- 4.4 In addition, the Council is mindful that the outcome of the Standard Method may change in the future to take account of any subsequent new data releases, and may need to respond as appropriate.
- 4.5 Of the adjoining authorities, only Sevenoaks District Council (SDC) is not planning to meet its own housing need and has formally requested whether this borough could meet some/all of this. Based on its submitted Local Plan 2015-2035<sup>12</sup>, SDC has an unmet need of 1,900 dwellings.

### Business

- 4.6 An Economic Needs Study (ENS)<sup>13</sup> was prepared, jointly for Sevenoaks and Tunbridge Wells Borough Councils, in 2016 to inform the Local Plan and make recommendations for the future provision of employment land (use classes B1, B2, and B8) across the borough. This has regard to the desirability of facilitating economic growth and increasing the choice of sites to ensure that the needs of different sectors can be met as far as possible over the plan period.

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<sup>11</sup> <https://beta.tunbridgewells.gov.uk/local-plan/evidence>

<sup>12</sup> [https://www.sevenoaks.gov.uk/downloads/file/1565/sdc001\\_proposed\\_submission\\_version\\_of\\_the\\_local\\_plan\\_december\\_2018](https://www.sevenoaks.gov.uk/downloads/file/1565/sdc001_proposed_submission_version_of_the_local_plan_december_2018)

<sup>13</sup> [https://beta.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0004/291730/Economic-Needs-Study\\_Final-Report-with-appendices-min2.pdf](https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0004/291730/Economic-Needs-Study_Final-Report-with-appendices-min2.pdf)

- 4.7 The ENS recommends that the Council should allocate sites to accommodate at least 14 hectares of new employment land (taking into account any residual capacity of existing employment allocations) to 2035. Further, it makes recommendations in respect of potential locations for employment development.

#### Retail

- 4.8 The retail and leisure needs of the borough have been determined through the Retail and Leisure Study<sup>14</sup>, produced in 2017. This assessed needs for both comparison (clothing, footwear, electrical goods, etc.) and convenience shopping (food, drink, etc.) over the period to 2033, including having regard to the current 'health' of the key centres within the borough.
- 4.09 It identifies a need for 21,700-34,000sqm of additional comparison floorspace and 7,500-9,500sqm additional convenience floorspace.
- 4.10 In recognising that the retail market is in a current state of change, it further recommends that the Draft Local Plan should allocate identified retail needs looking at least ten years ahead, and reviewed at least every five years.
- 4.11 While having a retail focus, the study sets out broad leisure requirements and highlights the importance of cultural and leisure activities in supporting the mix of uses within town centres.

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<sup>14</sup> <https://beta.tunbridgewells.gov.uk/local-plan/evidence/resources/employment,-leisure-and-retail/tunbridge-wells-retail-and-leisure-study>

## 5. Issues and Options consultation

5.1 The Issues and Options Consultation Statement<sup>15</sup> provides an overview of the public consultation on the Issues and Options document, informing who and how the Council consulted, what consultation material was used, how comments received have been considered and an evaluation of the consultation. Part 2 provides a summary of the comments received and the Council's initial response to those comments. These responses are supplemented in the Consultation Statement published alongside the Draft Local Plan, and available on the Council's website.

5.2 The information and analysis provided below is with reference to those consultation questions in the Issues and Options document relating directly to the formulation of the Development Strategy in the Draft Local Plan set out in Chapter 4 and in Policy STR1, which provides the overarching Development Strategy.

5.3 Questions 1 and 2 related to the draft Vision for the borough (as set out in that document) and suggestions for improving or updating the Vision. Key issues identified in the responses included:

- Too much focus on Tunbridge Wells and Paddock Wood – the Vision needs to ensure it illustrates how development will take place across the borough and address the needs of rural villages
- Place greater emphasis on role of the main urban area as a strategic location within a wider context of Kent and east Sussex
- Vision should be balanced to both developing existing built town areas and preservation of surrounding countryside and unique historic villages
- A number of different comments relating to constraints presented by the AONB and need to protect the Green Belt
- Vision should look how the borough will develop over a much longer period beyond the proposed Local Plan
- Vision should include reference to development and provision of additional infrastructure

5.4 Question 10 related to the five strategic options for delivery presented in the Issues and Options document, asking for comments on the preferred option or combination of options in order of preference. The strategic options being:

- (1) *Focused Growth*
- (2) *Semi-Dispersed Growth*
- (3) *Dispersed Growth*
- (4) *Growth-Corridor Led Approach*
- (5) *New Settlement Growth*

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<sup>15</sup> [https://beta.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0005/291461/Tunbridge-Wells-Borough-Issues-and-Options-Consultation-Statement.pdf](https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0005/291461/Tunbridge-Wells-Borough-Issues-and-Options-Consultation-Statement.pdf)

- 5.5 The strategic options presented took account of the evidence base compiled at that time and in accordance with the NPPF, the starting point was to meet the identified level of development needs in full unless there were good planning reasons why this would not be sustainable, for example because of development constraints. Although five possible options were presented, it was pointed out that a combination of two or more of the options may form the final preferred strategy to meet the identified growth within the new Local Plan. The main outcomes of the consultation for this question were:
- The most preferred option (60%) was Option 4 (growth corridor led approach)
  - 18% ranked Option 5 (new freestanding settlement) as most preferred approach, 13% ranked Option 1 (focussed growth), 8% Option 3 (dispersed growth) and 1% (semi dispersed growth) as their most preferred option
  - For a combination of options approach, 47% chose Option 4 (growth corridor) and Option 5 (new settlement) as their preference
  - 20% chose a combination of Option 4 (growth corridor led approach), Option 3 (dispersed growth) and Option 1 (Focused growth) as their preference
  - A number of other combinations were all suggested by approx. 4% of the respondents (full details listed in the Consultation Report)
- 5.6 Overall, there was a range of preferred combinations of strategic options among respondents, and the majority of those who expressed an opinion choosing a combination of Option 4 (growth corridor) and Option 5 (new settlement) as their preference.
- 5.7 Question 11 asked for views about the possibility of a new settlement somewhere in the borough providing for future development needs. Key issues referred to across the response groups included:
- Infrastructure issues: implementation and higher level funding to deliver infrastructure before buildings; would need excellent transport links
  - Could result in large development on greenfield land; should be located outside AONB and MGB (with comments that there is no suitable land in borough – would destroy rural character)
  - Should be sustainable mixed development to also provide employment with options for future expansion. Should be a stand-alone, self sufficient development planned as a whole
  - Should only be delivered once all development potential has been maximised.
- 5.8 Question 11a then asked for suggestions for the location of a new settlement. Responses included many different locations within the borough, some based on existing transport links and good access to other infrastructure.
- 5.9 Question 12 asked: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough? In summary, the responses were:



- 48% of respondents agreed that all reasonable options for accommodating future growth have been identified and considered; overall, the slight majority of 52% were in disagreement.

5.10 Question 12a: If no, please set out what other options for accommodating future development growth within the borough you think should be considered. A summary of responses included:

- Level of growth to be delivered by Local Plan questioned
- Role of farmsteads and hamlets, including modern farm buildings should be addressed
- Focus development in main urban area with a subsidiary focus in small towns and villages. Options for increasing densities in existing settlements, including building heights. Overall focus on sustainable locations
- Focus on A21 corridor

5.11 The main issues and themes identified in the responses to the Issues and Options consultation were used to inform the formulation of the development strategy included in the Local Plan. This process is set out in the following section.

## 6. Formulating the development strategy

### A) Identifying potential development sites

6.1 Potential development sites have been considered as part of the preparation of a Strategic Housing and Economic Land Availability Assessment (SHELAA)<sup>16</sup>.

i) 'Call for Sites'

6.2 As well as reviewing existing allocations, two 'Call for Sites' were undertaken, firstly from February to September 2016 and a further one between May and June 2017 (running concurrently with the Issues and Options consultation). For the second Call for Sites, officers contacted the promoters of sites submitted to the first Call for Sites and identified and then contacted owners of land around settlements (on a 'without prejudice' basis) that had not been submitted through the first Call for Sites to enable them to submit sites if they wished. This proactive approach encouraged owners of land that could be suitable for development to submit sites for consideration.

6.3 The Call for Sites remained open until the publication of the Draft Local Plan, although for any sites submitted after mid-February 2019 and the publication it has not been possible to include them within the site assessment process that is informing the Draft Local Plan (Regulation 18 consultation), as there was insufficient time to adequately assess such sites. Any sites that have not been submitted should be included as responses to the Regulation 18 consultation on the Draft Local Plan, in order that they may be assessed and potentially included in the Local Plan at the Regulation 19 submission stage.

ii) SHELAA process

6.4 In total, around 438 sites have been considered through the current SHELAA process. Full details of the sites submitted through the Call for Sites, the site assessment process and the Council's conclusions on each site's availability, achievability and suitability are set out in the SHELAA report, together with the findings and recommendations of the Sustainability Appraisal of sites.

6.5 The assessment of each site's suitability as part of an allocation policy has included a wide ranging analysis of desktop information using geographical information systems (GIS) and the outcome and recommendations of the relevant evidence base studies that have been prepared to support the Plan.

6.6 Sites have been assessed in collaboration with relevant service providers, such as officers of Kent County Council. Discussions have also been had with parish/town council/ neighbourhood plan groups (including with Royal Tunbridge Wells Town Forum): it has been useful to have local knowledge of particular characteristics of sites.

6.7 As part of a "first filtering stage", sites were filtered out: para 3.23 of the SHELAA provides a comprehensive list of the reasons why sites were filtered out at that stage. These include sites:

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<sup>16</sup> <https://beta.tunbridgewells.gov.uk/local-plan/evidence>

- located in remote locations away from existing settlements, as such sites considered unlikely to be sustainable (although remote sites have been considered in the context of a new Garden Village Settlement, where applicable);
  - not well related to a settlement;
  - clearly unlikely to provide less than 10 residential units;
  - about which there are significant landscape/ topographical/ heritage/ coalescence concerns.
- 6.8 The criteria set out in para 3.23 of the SHELAA dovetails with those used to screen out sites that are not regarded as 'reasonable alternatives ' in sustainability terms, as set out in the SA.
- 6.9 Following the first filtering stage, the SHELAA undertook a detailed consideration of all remaining sites. Further information on this is provided in paras 3.26 – 3.35 of the SHELAA, but it is particularly relevant to note that:
- to be suitable for allocation, as well as meeting planning policy requirements, in line with the NPPF, a site also needs to be 'deliverable' and 'developable'. These tests have been applied when assessing the suitability of a site for allocation in the new Local Plan;
  - a number of sites assessed as having development potential following the stage 2 assessment process were identified as sites that may not be included in the list of sites to be considered for allocation in the new Local Plan as they are unlikely to yield 10 or more dwellings – but could therefore contribute to a “windfall” supply of housing or economic development;
  - consideration was given to whether the extent of a site as submitted has potential in its own right or whether it would be appropriate to merge the site with adjacent land; for example, to increase growth potential or address a potential constraint such as site accessibility that can only be dealt with through a wider development approach;
  - the SHELAA also considered those sites which could form “reasonable alternatives” to potential strategic allocations (e.g. other sites which had been submitted, and different combinations of sites combined to form strategic sites).
- 6.10 The outcome of the SHELAA process was that:
- sites that are considered to be suitable for further consideration for allocation for development through the local plan process were identified across the borough;
  - this demonstrated that there was scope for development across virtually all settlements in the borough, and therefore that a relatively dispersed housing growth strategy at the majority of settlements across the borough that have defined LBDs was a deliverable option for the strategy of development.

## **B) The principles of the development strategy**

6.11 Drawing together the following, the Council brought together the principles of a development strategy:

- the results of the consultation on the Issues and Options document, including investigating the potential for a new settlement further;
- relevant work on the SA, including that advice that an approach combining the most sustainable elements of the growth strategy options and that new settlement growth was sustainable, and the SHELAA (that there is very broad geographical spread of sites suitable for allocation, and such sites include those for new settlements and urban expansions);
- detailed consideration of the restrictive national planning policies applying to the areas of constraint in the borough (including Green Belt (see Section 6F of this Paper) and High Weald AONB (see Section 6G)).

6.12 Through further detailed assessment (particularly in relation to assessment of individual sites against national Green Belt and AONB policy), this was refined to the form the development strategy set out in STR 1 in the Draft Local Plan.

6.13 The Council therefore considers that the following represents an appropriate approach to the overall strategy for the pattern and scale of development:

1. to aim to meet the identified development needs for the borough, unless there are good planning reasons why this is not possible, supported by necessary infrastructure provision;
2. that it makes as much use as possible (optimal use) of suitable PDL/brownfield sites and underutilised land, including optimising the density of development, particularly in the borough's town centres and other locations well served by public transport;
3. that it maximises the development potential outside those areas of the borough constrained by national landscape designations (High Weald AONB) and the Green Belt;
4. that, subject to compliance with relevant national policy, that a new settlement and/or strategic settlement extensions are considered;
5. that other (i.e. non-strategic) sites in the Green Belt are considered against national policy;
6. that other (i.e. non-strategic) sites in the AONB are considered against national policy, having particular regard to national policy on major development in the AONB<sup>17</sup>;

6.14 The subsequent sub-sections of this Topic Paper provides further information on points 2 – 6 above.

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<sup>17</sup> If sites are located in both the Green Belt and the AONB, it will be necessary for these to be considered against both.

### **C) Optimal use of suitable PDL/brownfield sites and underutilised land, including optimising the density of development**

- 6.15 Ensuring optimal use of suitable PDL/brownfield site and underutilised land, particularly within the LBDs of settlements, and in the town and village centres of the Borough, has been a long-standing thrust of Tunbridge Wells Local Plan policy, as is evident through the site allocations in the Local Plan 2006 and Site Allocations Local Plan (2016).
- 6.16 This has meant that many such suitable sites have already been identified, and in many instances have or are being developed (for example in RTW the former Royal Wells Hospital, Union House, etc), or have planning permission for their redevelopment, including for housing (e.g. the former Arriva bus garage on the A26, the former cinema site, etc). Given this previous focus, the number of remaining PDL/brownfield and underutilised sites is limited.
- 6.17 It is also pertinent to note the particular heritage constraints, and quality and form of the built environment within many of the settlements in the Borough, which requires a careful balance between maximising densities whilst delivering high quality development which is appropriate for its surrounds and context.
- 6.18 Nevertheless, the Council has, particularly through the Call for Sites and SHELAA process, sought to ensure that suitable PDL/brownfield sites and underutilised land are put to the optimal use. Examples of how this has been achieved include:
- reviewing all existing sites allocated in the SALP (2016) which do not have planning permission, and drawing (where relevant) on further discussions held with site promoters and developers (including at pre-application stage) to seek to increase the densities on those sites;
    - o perhaps the clearest example is at Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road: AL/RTW8 of the Draft Local Plan proposes the allocation of this site for approximately 80 units, informed by detailed assessment of potential development options. It is currently allocated in the SALP for 30 units;
  - recognising opportunities where sites include significant areas of hardstanding or built form, or are former waste sites, and could potentially be used much more intensively:
    - o examples include:
      - the allocation of residential development at the Benenden hospital site in East End under AL/BE4 , which proposes a considerable net increase in housing numbers (44-50 dwellings) and therefore density above that already permitted or existing;
      - the accommodation of retail and residential development at be at AL/RTW 16 Land at Wyevale Garden Centre, Eridge Road, allocated for retail development and an element of residential;

- the allocation of the North Farm landfill site, North Farm Lane and land under AL/RTW 14 to include leisure (or renewable energy) facilities;
- recognising opportunities to make better use of areas of sporting facilities (subject to stringent criteria at the planning application stage about the loss of such existing facilities), either because:
  - their configuration could potentially facilitate this (e.g. AL/CRS 2 Big Side Playing Field, adjacent to Quaker Lane and Waterloo Road, Cranbrook or AL/CRS 3 Jaegers Field, Angley Road, Cranbrook), or;
  - the site would become available as part of a more comprehensive strategy to rationalise and consolidate playing pitch provision, as at : AL/RTW 21 Land at Culverden Stadium, Culverden Down, AL/RTW 22 Land at Bayham Sports Field West, AL/RTW 24 Land at Cadogan Sports Field, St John's Road etc.)
- through the use of a masterplanning process, particularly where this will be led by the Council, such as at the town centre of Paddock Wood.

6.19 Furthermore, a housing windfall allowance is included within the housing supply calculation based on the assumption that infill development, development on brownfield land, and intensification of development will continue to come forward and deliver a quantity of development that can be counted towards the housing supply. This applies to all areas within the borough. ;

6.20 As above, there is a highly varied built environment and heritage context of the different parts of the settlements in Tunbridge Wells. It is therefore not considered appropriate to set a numeric minimum density standard for either the settlement centres or elsewhere. Nevertheless, policy H4 of the Draft Local Plan avoids homes being built at low densities and ensure that (housing) developments make optimal use of the potential of each site:

*“Development shall be delivered to an appropriately high density having regard to its context, including landscape, topography, surrounding built form, and any other relevant factors.*

*Planning applications will be refused where development is found not to make efficient use of land”.*

6.21 Through the approach taken to site allocations, particularly in RTW and the other larger settlements in the borough, together with the “development management” policy approach, the development strategy makes optimal use of suitable PDL/brownfield sites and underutilised land, and optimises the density of development.



**D) Maximising the development potential outside those areas of the borough constrained by national landscape designations (High Weald AONB) and the Green Belt**

- 6.22 As set out in the preceding sub-section, the strategy for the distribution of development has sought to make the optimal use of suitable PDL/brownfield site and underutilised land, particularly within the LBDs of settlements (i.e. outside the Green Belt) and in many instances outside the AONB.
- 6.23 Furthermore, the SHELAA has identified a number of suitable sites around the eastern and northern sides of Paddock Wood and the settlements of Horsmonden, Sissinghurst, and (to a lesser extent) East End (Benenden) and Frittenden, all of which are outside both the AONB and Green Belt designations. The Council has also subjected other broad areas (around Frittenden), or particular sites (Blantyre House), which are outside the AONB and Green Belt to sustainability appraisal even those these were not submitted in the Call for Sites. This proactive approach demonstrates the extent to which the Council has investigated the development potential for those areas outside the AONB and Green Belt.
- 6.24 Other sites outside the AONB and Green Belt submitted in the Call for Sites have been subject to the rigorous assessment through the SA and SHELAA, but are not proposed to be allocated as a result of their assessment under these processes.
- 6.25 Proposed allocations within the LBDs making optimum use of land, and the allocations at the aforementioned settlements, have maximised the development potential of the areas outside the AONB and Green Belt, and represent proportionately more development than has been previously delivered.

## E) Consideration of a new settlement and/or urban extension

### i) SHELAA and SA considerations

- 6.26 Para 72 of the NPPF recognises that “*the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities*”. This para also sets out the key considerations when planning for such development.
- 6.27 As detailed above in sub-section 7 B), the SA advises that new settlement growth was a sustainable element to the strategy, and the responses to the Issues and Options document including investigating the potential for a new settlement further.
- 6.28 The following figure replicates Figure 5 from page 37 of the SA. This shows, the sites, or individual sites which could be made into parcels, that were submitted in the Call for Sites of a scale where consideration was given as to whether they could comprise a new settlement or significant extension to existing settlements.
- 6.29 The two starred shapes also identify other areas which were considered as possible locations for a new settlements. Although these sites were not submitted in the “Call for Sites”, and therefore would have been considered as not available (and indeed not achievable) if they had have been considered through the SHELAA process, it was considered appropriate to assess these under the SA due to their location outside the AONB and the Green Belt – having regard to the principle outlined in the previous sub-section of seeking to maximise the development potential outside these areas. The SA conclusions for these sites are set out in Table 2 below: it is worth noting additionally that there are issues related to highway suitability and access to jobs and higher order services, and the very rural character of the areas, as well as piecemeal land ownership: no large sites were submitted in the case of Frittenden.
- 6.30 Table 2, which follows, sets out the conclusions of the SA and the conclusions of the SHELAA for these areas, and the site known as Caenwood Farm.

## Distribution of Development Topic Paper for Draft Local Plan – Regulation 18 Consultation

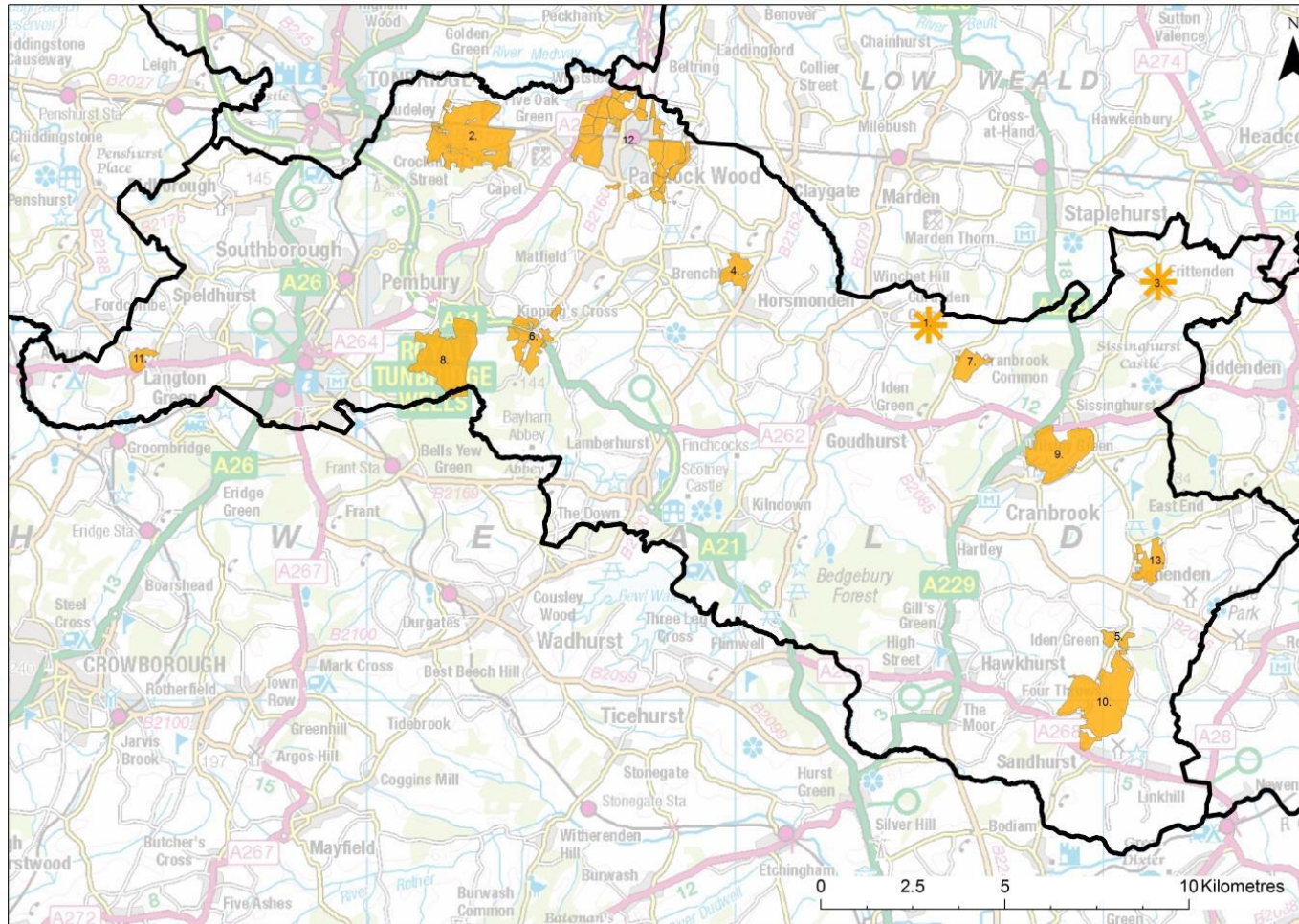


Figure 5: Figure 5 from page 37 of the Sustainability Appraisal: Map of garden settlement options within the Borough

Ref in Fig 5	Locations Considered a) Gives SA reference name, and b) Gives SHELAA reference name	SHELAA ref)	Explanation of approach taken by SA	SA?	SHELAA conclusions
1	a) Blantyre House (former prison) Goudhurst Parish  b) N/A as not submitted in Call for Sites	N/A	Location has the benefit of being outside of some key constraints and is within reach of the mainline rail at Staplehurst. However, the scale of site was too small and the site was not submitted in the call for sites and thus this option did not become available for appraisal.	No	N/a as not submitted in Call for Sites
2	a) Capel  b) Land at Tudeley	Site 448	Submitted in the call for sites as a combination of site numbers 178, 183, 308, 418, 440, 446, 448, 452 and 453. Land is outside of key constraints (except Green Belt) with potential for useful transport links. The site was also within reasonable distance to other large settlements. This site was considered to be a reasonable alternative.	Yes	<p>The site has been submitted as a potential new settlement.</p> <p>For the reasons set out, the site is considered suitable as a potential Local Plan allocation subject to further consideration.</p> <p>Key considerations for planning for new settlements/ significant extensions to existing settlements are set out at para 72 of the NPPF.</p> <p>The site is outside but adjacent to the AONB: whilst regard must be had to the AONB setting, the policy constraints of this national designation do not apply.</p> <p>The site is in the Green Belt: the TWB Green Belt study (2017) identified that the harm caused by the release of land in this broad parcel is “high”.</p> <p>There is national policy protection for the Green Belt, but the NPPF also recognises that Green Belt boundaries can be altered where there are exceptional circumstances, and these are fully evidenced and justified.</p> <p>Having regard to this, subject to the demonstration that there are exceptional circumstances to release this land from the Green Belt, and that matters such as the provision of appropriate infrastructure (including transport) and the setting of heritage assets can be addressed through a masterplanned approach, the site is considered suitable</p>
3	a) Frittenden area  b) N/A as not submitted in Call for Sites		Location has the benefit of being outside of key constraints and is not distant from mainline rail at Headcorn. However, site was not submitted in the call for sites and thus this option did not become available for appraisal.	No	N/a as not submitted in Call for Sites
4	a) Horsmonden  b) Land adjacent to Yew Tree Green Road, Maidstone Road and Furnace Lane	144	Submitted in the call for sites as site 144. Location would represent an increase in Horsmonden using garden settlement principles. Landscape sensitivity would require further consideration because the site is outside (but adjacent to) the AONB. However, the site was considered to have severe access difficulties that would render this alternative unviable and thus not a reasonable alternative.	No	<p>This site is considered unsuitable as a potential site allocation.</p> <p>This would be a very large scale strategic allocation that would be disproportionate to the size of the settlement, with concern about landscape and heritage.</p>
5	a) Iden Green  b) Land adjacent to Iden Green	437	Submitted in the call for sites as site 437. However, the site is wholly very rural and within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No	<p>This site is considered unsuitable as a potential site allocation.</p> <p>The site is considered remote from Benenden settlement centre and is likely to be unsustainable in this context. There are significant landscape and national AONB policy concerns with development of this scale in the AONB.</p>
6	a) Kippings Cross  b) East of Pembury and adjacent to the northern and southern carriageways of the A21	459 Includes sites 23, 111, 214, 326, 333, 341, 383 and additional land	Submitted in the call for sites as a combination of site numbers 23, 300, 326, 111, 341, 383, 333, 214 and 65. However, the sites are within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No	The site is separated from Pembury and Matfield, although has been submitted as a potential new settlement with the potential for housing, employment, etc. development to be delivered on that basis.

					<p>Given the strong policy protection given to the AONB (a national designation) in the NPPF, this site is not suitable for development, and given the wider site assembly by a national housebuilder has now ceased, the site is now not considered to be available or achievable.</p> <p>The whole site is therefore considered unsuitable as a potential Local Plan allocation.</p>
7	a&b) Land adjacent to Colliers Green Primary School, Colliers Green		Submitted in the call for sites as site 325. However, the extremely rural nature of the site, distance to urban settlements and the impacts upon the setting of the AONB were considered too severe to warrant consideration as a reasonable alternative.	No	<p>This site is considered unsuitable as a potential site allocation. This site is remote from a settlement centre and is unlikely to be sustainable in this context. It would be a strategic site of a scale harmful to the AONB landscape.</p>
8	a & b) Land at Great Bayhall East of RTW	384	Submitted in the call for sites as site 384. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No	<p>The site is separated from Hawkenbury/Royal Tunbridge and Pembury, although has been submitted as a potential new settlement with the potential for housing, employment, etc. development to be delivered on that basis.</p> <p>Given the strong policy protection given to the AONB (a national designation) in the NPPF, the whole site is considered unsuitable as a potential Local Plan allocation.</p>
9	<p>a)Land between Cranbrook and Sissinghurst</p> <p>b)Land to the east of Cranbrook and the south of Sissinghurst</p>	Late Site 22	Submitted in the call for sites as late site 22. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No	<p>Although the site has been submitted as a potential new settlement with the potential for housing, employment, etc. development to be delivered on that basis.</p> <p>Given the strong policy protection given to the AONB (a national designation) in the NPPF, the whole site is considered unsuitable as a potential Local Plan allocation.</p> <p>Key considerations for planning for new settlements/significant extensions to existing settlements are set out at para 72 of the NPPF.</p> <p>However, national policy regarding major development in the AONB is clear: the tests to be met for major development in this designation are extremely high, and include demonstrating that (housing and employment) needs cannot be met outside the AONB (either in the Borough, or outside, under the Duty to Co-operate).</p> <p>Nationally, development of this scale in the AONB is unprecedented.</p> <p>The level of harm (landscape and scenic beauty) that would arise to the AONB is high. This SHELAA has demonstrated the availability of suitable sites outside the AONB. This site is therefore not suitable for development.</p>
10	<p>a)Land between Sandhurst and Iden Green</p> <p>b)Challenden Farm</p>	438	Submitted in the call for sites as site 438. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No	<p>Although this has been submitted as a potential new settlement with the potential for housing, employment, etc. development to be delivered on that basis.</p> <p>Given the strong policy protection given to the AONB (a national designation) in the NPPF, the whole site is considered unsuitable as a potential Local Plan allocation.</p>
11	a)Langton Green Adjoining western edge of existing	Late site 23	Submitted in the call for sites as late site 23. Location would represent an increase in Langton Green using garden settlement	No	<p>This site is considered unsuitable as a potential site allocation.</p>

	development b)Land to the north of Langton and Ashurst Road		principles with easy access to all the services and facilities that RTW provides. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.		The site sits in a very sensitive landscape and in the Green Belt. It is a Green Belt parcel the release of which would cause high/very high harm. It is of a scale that this would be major development harmful to the AONB and which would be harmful to the settlement pattern
12	a)Paddock Wood Land surrounding the existing settlement b)Land at Capel & Paddock Wood	20, 47, 51, 79,142, 212, 218, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 340, 342, 344, 347, 371, 374, 376, 402, late site 26 and late site 48	Submitted in the call for sites as a combination of site numbers 20, 47, 51, 79, 141, 142, 212, 218, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 340, 342, 344, 347, 371, 374, 376, 402 and late sites 26, 48 and 52. Land is outside of key constraints (except flooding and Green Belt) and has useful transport links. This site was considered to be a reasonable alternative.	Yes	The site has been considered on the basis of mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses.  For the reasons set out, the site is considered suitable as a potential Local Plan allocation subject to further consideration.
13	Walkhurst Farm, Benenden	436	Submitted in the call for sites as site 436. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No	The site is remote from Bendenden, Cranbrook and Tenterden (in Ashford Borough), although has been submitted as a potential new settlement with the potential for housing, employment, etc. development to be delivered on that basis.  Given the strong policy protection given to the AONB (a national designation) in the NPPF, this site is not suitable for development.
N/A	a)Land at Caenwood Farm and Whitegates Farm, Reynolds Lane b)Caenwood Farm	30 in conjunction with sites 100, 199 and 205	This is a large site that would make a significant positive contribution to the housing objective. However, the substantial use of private vehicles in this location causes the noise and air objectives to score very negatively. The site also has sensitive biodiversity, heritage and landscape features.	Yes	This site is considered unsuitable as a potential site allocation. There are landscape impact concerns as well as significant highway concerns

Table 2: Conclusions of the SHELAA and SA on garden settlement options



- 6.31 As indicated in Table 2, the majority of the sites considered as potential new settlements, or significant extensions to existing villages, were not considered as reasonable alternatives in the SA, or were not considered as suitable by the SHELAA.
- 6.32 It is noted that the majority of these sites which were submitted by landowners/promoters/ (and in the case of Kippings Cross) by a national housebuilder in the Call for Sites are located in the AONB. As set out in Section 6G of this Topic Paper in further detail, national policy regarding major development in the AONB is clear: the tests to be met for major development are extremely high, and include demonstrating that (housing and employment) needs cannot be met outside the AONB (either in the Borough, or outside, under the Duty to Co-operate). Nationally, development of a new settlement or significant extension to an existing village or and town of such a scale as to meet the requirement under para 172 b) of the NPPF (i.e. that the size of the proposal will support a sustainable community, with sufficient access to services and employment opportunities within the development itself, or in larger towns to which there is good access) in the AONB is unprecedented.
- 6.33 The level of harm (landscape and scenic beauty) that would arise to the AONB from potential strategic sites is unacceptably high. Furthermore, the SHELAA demonstrates the availability of suitable sites outside the AONB to provide a supply of large numbers of homes.
- 6.34 Accordingly, all the sites, or parts of sites, which are located in the AONB, were not considered as suitable for allocation, both as a general principle and in terms of the individual consideration of each site. This meant that all sites within the AONB were discounted at a fairly early stage in the Council's considerations of the strategy for the distribution of development.
- 6.35 Other sites, including for example that referred to as Caenwood, or site 144 at Horsmonden, were not considered as either reasonable alternatives in the SA or were not considered suitable as a SHELAA allocation for other key reasons, which are set out in the table above.

Consideration of Tudeley village and land at Capel and Paddock Wood against para 72 of the NPPF

- 6.36 In undertaking the assessment of the suitability of these sites as a new settlement and significant expansion, respectively, consideration was given to the requirements of para 72 of the NPPF. This is set out in Table 3 below.
- 6.37 In terms of consideration b) of para 72, scale is important for the functionality and sustainability of a new settlement: the size of a new settlement needs to be sufficient to support everyday services, such as shops, education and healthcare provision. The provision of such services will influence quality of place, level of containment and

ultimately households' decisions to live in a new settlement as these will be fundamental to delivering it. Appendix 4 to this Topic Paper has drawn on the evidence from the Role and Function Study (2017), and has compared population numbers of settlements within the Borough to the types and numbers of facilities available. From this, and supplemented by the information in the Infrastructure Delivery Plan, it can be concluded that the scale of development of both sites is sufficient to support a good range of facilities and services.

- 6.38 Table 3 demonstrates that the two sites, subject to consideration of national Green Belt policy, perform positively against the considerations of para 72 of the NPPF.

	a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;	b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;	c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided	d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and	e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size
<b>Tudeley</b>	<p><u>Infrastructure</u></p> <p>Given the undeveloped nature of the site itself, the existing on-site health, water, community, public and social service open space, sport and recreation infrastructure is limited, although this will be the case for many greenfield sites for new settlements.</p> <p>The site is served by the Capel primary school adjacent to its eastern edge, and the existing green infrastructure at the site is considerable.</p> <p>Importantly, the site itself is geographically well related to the infrastructure at Tonbridge, RTW/ Southborough and Paddock Wood, with the potential for high quality public transport and active travel links to these locations.</p> <p>The wording of the draft policy is clear that infrastructure provision for this settlement, and between this location and Tonbridge, Southborough/ RTW and Paddock Wood must be masterplanned, and the Council will lead on this masterplanning.</p> <p>The infrastructure required for the settlement is detailed in the Infrastructure Delivery Schedule, within the Infrastructure Delivery Plan:</p> <ul style="list-style-type: none"> <li>- a new community hall/centre to serve the new settlement;</li> <li>- one, 3 forms of entry (FE) primary school or two, 2FE</li> <li>- the creation of up to eight FE secondary education at the Tudeley and Capel/Paddock Wood area, including securing land (through the development of the Tudeley site) for a secondary school (under policy AL/CA2) which is within walking and cycling distance of the settlement;</li> <li>- a new GP practice to serve this area (either within the new garden settlement or within the Paddock Wood/Capel area);</li> <li>- new open space, sports and recreation provision in accordance with recommended open space standards.</li> </ul> <p><u>Economic potential</u></p> <p>The area is considered to have good economic potential: in</p>	<p>Consideration of the site size has been given within both the SA and the SHELAA, particularly consideration of a larger site (SHELAA reference 446) which extended to both the north and south. However, the location of the southern portion of this larger site in the AONB, and the extent of the flood plain of the river Medway to the north has meant that this alternative has been discounted through the SA and SHELAA processes.</p> <p>There are some limited services available at the boundaries of the site, including restaurants, public houses and a church.</p> <p>As set out in Appendix 4, the level of services provided in settlements of similar sizes in the Borough provides good access to services, and there are no reasons to consider that similar services would not be sustained at this development. .</p> <p>Additionally, as referred to in relation to consideration a), the site is well located relatively to the larger settlements of Tonbridge, Paddock Wood, RTW/Southborough, with the potential for high quality public transport links to the services, employment and rail links available in those locations.</p>	<p>The policy wording (AL/CA1) is clear about the expectations of the highest quality development, and specific reference is made to a requirement for development to proceed on garden community principles:</p> <p><i>“The layout and design is to be of the highest quality, with exceptional permeability and low levels of private car use within the settlement. The design quality, as an exemplar, to be one of the justifications for the release of Green Belt land”.</i></p> <p>The policy wording is also clear that development must take place in accordance with a masterplan for the settlement itself, and that this masterplan is developed in conjunction with the wider infrastructure masterplan detailed under consideration a)</p>	<p>The assessment of delivery rates and timelines are realistic, and are set out in the Housing Delivery and Trajectory Topic Paper.</p>	<p>The settlement would (given that it is proposed to be removed from the Green Belt), be surrounded by existing Green Belt.</p>

	<p>terms of the provision of employment opportunities on site, it would be relatively well located to the A21. It is identified in Economic Needs Study (2016) <sup>18</sup> at paras 9.68- 9.69 (2016) that the A21 growth corridor is recognised as an excellent opportunity for new employment .</p> <p>The site would also have a good workforce catchment, both from the development itself, and likewise though being well located relatively to Tonbridge, Paddock Wood, Five Oak Green and Southborough/RTW, with access via proposed active travel links.</p> <p>Likewise, the Economic Needs Study identifies that the majority of employment in the borough is provided at Southborough/Royal Tunbridge Wells and Paddock Wood: Tonbridge also contains considerable employment. The area therefore has the potential to improve the economy through additional patronage of services in these locations by new residents, and additional workforce availability for existing businesses.</p> <p>The Transport Assessment Report recognises that considerable travel from this northern part of the borough to London (and back) for work, and it is expected that there would still be an element of such travel: this can serve to benefit the economy of the wider region, but also the local area through salary spend (earned in London) more locally.</p> <p>The development is of such a scale that the construction of the site would create significant employment opportunities and associated local economic benefit through the supply chain – although it is recognised that this is the case for any developments of such scale.</p> <p><u>Scope for environmental gains</u></p> <p>The site itself, together with the wider landholding of the site owners, provides considerable scope for net environmental gains, in terms of environmental quality, public accessibility, ecology and biodiversity, and managing/mitigating flood risk, including the delivery of betterment to some residents of Five Oak Green through reducing existing flood risk.</p>				
<b>Land at Capel and Paddock Wood</b>	<p><u>Infrastructure</u></p> <p>There is considerable existing infrastructure in Paddock Wood, including in terms of transport (road and rail), education (primary and secondary), health, open space, etc. However, there are some elements of the existing infrastructure which are under considerable pressure, including foul water provision.</p> <p>The wording of the draft policy is clear that future infrastructure provision for this area, and between this and Tonbridge, Southborough/ RTW and Paddock Wood must be</p>	<p>Consideration of the site size has been given within both the SA and the SHELAA, through the combination of different sites submitted in the Call for Sites. As set out at paras 6.2.27, 6.2.29 and 6.2.30 of the SA the various combinations scored differently, although as explained in the SA the Council considers that the option proposed is that to be pursued.</p>	<p>The policy wording (AL/CA3 and AL/PW1, 2 and 41) is clear about the expectations of the high quality development, and specific reference is made to a requirement for development to proceed on garden community principles.</p> <p>The policy wording is also</p>	<p>The assessment of delivery rates and timelines are realistic, and are set out in the Housing Delivery and Trajectory Topic Paper.</p>	<p>Consideration has been given to the provision of additional green belt to the east of Paddock Wood. However, given that the A228 would provide a defined physical boundary which is</p>

<sup>18</sup> [https://beta.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0004/291730/Economic-Needs-Study\\_Final-Report-with-appendices-min2.pdf](https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0004/291730/Economic-Needs-Study_Final-Report-with-appendices-min2.pdf)

	<p>masterplanned, and the Council will lead on this masterplanning.</p> <p>The infrastructure required for the settlement is detailed in the Infrastructure Delivery Schedule, within the Infrastructure Delivery Plan. This is extensive, so won't be repeated here, but key elements include</p> <ul style="list-style-type: none"> <li>- A228 strategic transport link (Colts Hill bypass);</li> <li>- Upgraded roundabout at A228 Whetsted Road/B2160 Maidstone Road;</li> <li>- Distributor road to the east of Paddock Wood;</li> <li>- Signalise junction B2107 Badsell Road/B2160 Maidstone Road/ Mascalls Court Road;</li> <li>- New bus only link from Paddock Wood to Tonbridge via Tudeley, with opportunity for automation (Level 4 / Level 5);</li> <li>- Demand Responsive urban bus services in Paddock Wood area (linking to rail station)</li> <li>- Flexible bus service centred on town centre and rail station. Link to new residential and employment opportunities. Similar to Arriva Click Sittingbourne;</li> <li>- New cycle route to link Paddock Wood to Tonbridge via Tudeley village and new cycling infrastructure within Paddock Wood, linking to the proposed Hop Pickers Line cycle route</li> <li>- Creation of up to eight FE within Paddock Wood/Capel/Tudeley, including the expansion of Mascalls school;</li> <li>- A GP Practice to serve this area (or within Tudeley);</li> <li>- Additional waster water treatment capacity required over the Plan Period to be determined, and strategic planning and delivery of sewer network;</li> <li>- Flood mitigation measures, including strategic storage upstream of Parcel 1 at Paddock Wood on Tudeley Brook, flood defence (walls and embankments) extending north of Parcel 1 to the railway line, increased channel conveyance/new channels etc;</li> <li>- new open space, sports and recreation provision in accordance with recommended open space standards, including a new sports hub and Improvements to Putlands Leisure centre.</li> </ul> <p><u>Economic potential</u></p> <p>Paddock Wood and land immediately adjacent to this has strong links with Tonbridge and RTW, and has good access to Maidstone and Ashford via Paddock Wood train station, and the A228 connects the location to the rest of the Medway Towns.</p> <p>The Economic Needs Study identifies that the majority of employment in the borough is provided at Southborough/Royal Tunbridge Wells and Paddock Wood. Paras 9.47 – 9.53 of this Study specifically identify that the land to the east of Maidstone Way and the Eldon Way employment areas are well occupied and provide a good base for future employment expansion: i.e.</p>	<p>There are significant services available within the existing town centre, some limited services available at the boundaries of the site, including restaurants, public houses and a church. The site is well located relatively to the larger settlements of Tonbridge, Paddock Wood, Royal Tunbridge Wells and Maidstone.</p> <p>A larger population and rejuvenated/regenerated town centre would have cultural and community benefits.</p>	<p>clear that development must take place in accordance with a masterplan for the settlement itself, and that this masterplan is developed in conjunction with the wider infrastructure masterplan detailed under consideration a)</p>		<p>readily recognisable and likely to be permanent.</p>
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	<p>there is a range of existing businesses in the local area that provide good ground to develop further economies of agglomeration.</p> <p>The centre of Paddock Wood is modest, but has a supermarket, local shops and attractive: it is considered that growth in the population of Paddock Wood and surrounds (including in eastern Capel) could be beneficial in strengthening the existing town centre in terms of its employment offer and economy. In particular, significantly larger population could be expected to retain and grow more and higher-order shops and services in the settlement</p> <p><u>Scope for environmental gains</u></p> <p>It is considered that the key scope for environmental gains is through the rejuvenation and regeneration of the town centre, and in the provision of flooding infrastructure, which the Strategic Flood Risk Assessment has identified provides the opportunity to delivery “betterment” to some existing areas within Capel and Paddock Wood. Through the masterplanning approach, there will also be some scope for net environmental gains, in terms of environmental quality, public accessibility, ecology and biodiversity.</p>				
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Table 3: Consideration of proposed strategic allocation sites against para 72 of the NPPF



## F) Further consideration of development potential in the Green Belt

- 6.39 Approximately 22% of the borough lies within the Metropolitan Green Belt (MGB), representing a total of 7,134 ha. Moreover, the majority of the Green Belt wraps around the main urban area of Royal Tunbridge Wells and Southborough, around Pembury and the area to the east of Tonbridge/west of Paddock Wood (located within Capel parish), the eastern boundary immediately adjoining the existing western developed boundary of Paddock Wood.
- 6.40 The majority (5,231 hectares) of the Green Belt is also designated as AONB. The area that is also AONB land is mainly located around the edge of the main urban areas of Royal Tunbridge Wells and Southborough and around the built area of Pembury. The main area of Green Belt outside the AONB lies to the west of Paddock Wood. More information about the assessment of sites located within the AONB is provided in the following AONB section of this paper.

### Identifying exceptional circumstances to release Green Belt land

- 6.41 Paragraph 136 of the NPPF states that, once established, Green Belt boundaries should only be altered where “*exceptional circumstances*” are fully evidenced and justified, through the preparation or updating of plans. (This covers the stage that the Council is now at in its plan-making process in the preparation of a new Local Plan - carrying out a Regulation 18 consultation).
- 6.42 Paragraph 137 of the NPPF requires that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, it is necessary for the Council to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, including making as much use as possible of suitable brownfield sites and under-utilised land, optimising density of development (including policies that promote a significant uplift in minimum density standards in town centres and other locations well served by public transport), and informed by discussions with neighbouring authorities about whether they could accommodate some of this borough’s identified need for development.
- 6.43 Neither the NPPF nor the Planning Practice Guidance (PPG) provide a formal definition and/or set of criteria as to what circumstances could be considered as exceptional. As a result of other local planning authorities proposing to alter Green Belt boundaries through the preparation of their Local Plans, case law has identified a number of points that can be used as guidance.
- 6.44 Of particular note, in the case of *Calverton Parish Council v Greater Nottingham Councils* 2015 High Court Judgement, where the objectively assessed housing need (OAN) has already been determined, the following issues were raised:
- The acuteness/intensity of the OAN;
  - The inherent constraints on supply/availability of land prime facie suitable for delivering sustainable development;

- The consequent difficulties in achieving sustainable development without impinging on the Green Belt;
  - The nature and extent of the harm to the Green Belt which would be lost if the boundaries were reviewed; and
  - The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.
- 6.45 Case law has also established that general planning merits cannot be exceptional circumstances. For example, it is not sufficient to redraw Green Belt boundaries based on a site being considered to be in a sustainable location.
- 6.46 In the absence of a formal definition or set of criteria to be met, it is for the Council to determine whether it considers exceptional circumstances exist to justify amending Green Belt boundaries through the preparation of its new Local Plan.
- 6.47 From researching the approach taken by other planning authorities when preparing their Local Plans, a list of the main issues that need to be determined before establishing whether exceptional circumstances exist to allow for the consideration of changing Green Belt boundaries has been drawn up:
- Demonstrate that all reasonable and acceptable efforts have been taken to maximise the amount of development within the urban area – that is, optimising densities and ensuring that all land is appropriately used, including delivering a balance of development between residential, employment and other uses. This approach has been used by other local planning authorities to support proposals for Green Belt release; for example, Warwick District Council put forward the case (after demonstrating that they had maximised all other alternative options for delivering development outside the Green Belt) that a Green Belt release would deliver development that would provide an important contribution to the supply and mix of housing in a sustainable location which currently provides employment and community facilities.
  - Unmet need (after demonstrating the above has been carried out) is a contributing factor in the consideration of exceptional circumstances for moving Green Belt boundaries.
- 6.48 The following factors are considered to be exceptional circumstances specific to this borough to justify changes to Green Belt boundaries:
- The borough is heavily constrained – Aside from the 22% of the borough designated as Green Belt, 70% is AONB, with 5,321 ha of Green Belt land (out of 7,134 ha) also being within the AONB. This means that 74.5% of the Green Belt land is also within the AONB. Moreover, the majority of the Green Belt wraps around the main urban area of Royal Tunbridge Wells and Southborough, around Pembury and the area to the east of Tonbridge/west of Paddock Wood (located within Capel parish), the eastern boundary immediately adjoining the existing western developed boundary of Paddock Wood.

- Virtually any growth of the more sustainable parts of the borough in terms of accessibility and provision of services would impact on the Green Belt.
- Development requirements are higher than for previous Local Plans – the housing requirement identified through the Standard Method is more than twice that required for the Core Strategy 2010. Although it is the case that the main reason for releasing land from the Green Belt is to deliver housing, other types of development are also proposed. The Economic Needs Study recommends that at least 14 hectares of new employment land should be provided in order to support the creation of new employment opportunities alongside the provision of new housing and also limiting the need for people to commute, requiring identification of suitable land in sustainable locations.
- Without the release of land currently located within the Green Belt, the Council will be unable to meet the identified development needs of the borough in a planned and integrated way, primarily for meeting the borough's housing needs but also for employment uses and delivering a secondary school.
- Neighbouring local authorities are unable to meet any of TWBC's unmet housing needs due to their constraints, including Green Belt and AONB. The Council has been actively engaging with all of its neighbours within Kent: Sevenoaks District Council, Tonbridge & Malling Borough Council, Ashford Borough Council, and Maidstone Borough Council as well as Kent County Council, and with neighbouring authorities that share a border in East Sussex: Rother District Council and Wealden District Council, as well as East Sussex County Council. This Council intends to agree Statements of Common Ground where relevant and these will be available to view as part of the forthcoming draft Duty to Cooperate Statement. However, it is the case that none of the above local authorities have been able to demonstrate that they have spare capacity to meet any unmet development needs of this borough.
- All reasonable options to deliver development without releasing land in the Green Belt have been fully examined and utilised; details are provided in other sections of this Topic Paper, but are summarised below.
- As set out in Section 6F, the strategy for development has maximised development within existing built up areas<sup>19</sup> and optimised densities:
  - Proposed densities for sites within the main urban areas are generally expected to deliver higher densities than those in a more rural location, with specific requirements in policies to seek opportunities to deliver high density development around settlement centres and other key points. Furthermore, the proposed Housing Density policy will require that development shall be delivered to an appropriately high density having regard to its context, including landscape, topography, surrounding built form, and any other relevant factors, and that "*planning applications will be refused where development is found not to make efficient use of land*";

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<sup>19</sup> in the case of Tunbridge Wells Borough Council it is proposed that this is taken to refer to the Main Urban Area of Royal Tunbridge Wells and Southborough, together with the larger rural settlements of Paddock Wood, Cranbrook, and Hawkhurst

- The Local Plan promotes the development of brownfield sites within the built-up areas (usually defined by the relevant LBDs); a number of allocations are on sites with existing uses and it is expected that development in these locations will be delivered as part of a comprehensive redevelopment of such sites, providing a mix of uses in a sustainable location;
- A housing windfall allowance is included within the housing supply calculation based on the assumption that infill development, development on brownfield land, and intensification of development will continue to come forward and deliver a quantity of development that can be counted towards the housing supply. This applies to all areas within the borough;
- The demonstration of exceptional circumstances for major development in the AONB within this borough (ref para 172 of NPPF), and explained in more detail in the AONB section of this Topic Paper, has resulted in some site allocations for major development in such areas. However, a conclusion has been reached that there is no further capacity within the AONB to deliver additional development capacity beyond that which is already being proposed in the Local Plan.
- Ensuring all land is appropriately used, including delivering a balance between residential, employment and other land uses to deliver mixed development that meets identified needs. In the site allocation policies in the Local Plan the Council has sought to allocate uses appropriate to a site's location whilst also ensuring that the development needs identified in the Local Plan, including the necessary infrastructure to support development, are delivered;
- The SHELAA and the Sustainability Appraisal (SA) have identified all suitable sites outside the Green Belt (and, for major sites, outside the High Weald AONB).

Having undertaken this process, the Council considers that there are exceptional circumstances to alter the boundaries of the Green Belt to remove land from the designation in order to enable the Local Plan to include proposals for development in the Green Belt that fall under the following headings:

- Release of areas of land at Capel and Paddock Wood (Allocation Policy AL/CA3 and AL/PW1) and at Tudeley (located within Capel parish, Allocation Policy AL/CA1) for a wide range of land uses, including built development to deliver strategic development opportunities.
- The above has established the broader exceptional circumstances which exist for the release of land from the Green Belt in the Borough;
- In terms of these two sites themselves, there are additional site and development specific circumstances, which been factored into this consideration;
- For land at Capel and Paddock Wood:
  - the land proposed to be released from the Green Belt here is part of a wider release of non-Green Belt land to deliver development in a sustainable location, around an existing settlement, with the potential to

rejuvenate and revitalise the town centre: approximately 48% of the total area of land included in Policies AL/PW1 and AL/CA3 is currently designated as Green Belt;

- through the comprehensive development of this site, and particularly the land to the west of Paddock Wood (i.e. that which would be released from the Green Belt), it has been identified through the Strategic Flood Risk Assessment that there is the potential for the flood mitigation required in association with this development to deliver “betterment” through reduced flood risk to existing areas of Paddock Wood and its surrounds. This requirement is specifically included in the policy, and contributes to the exceptional circumstances for the release of this land from the Green Belt;
- For Tudeley:
  - through the development of the site, and the provision of flood mitigation measures on the wider landholding of the site owner, it is considered that there is the potential to reduce the existing flood risk to areas within Five Oak Green. This requirement is specifically included in the policy, and contributes to the exceptional circumstances for the release of this land from the Green Belt
  - furthermore, the proposal represents an opportunity to deliver development of exemplar design quality, with exceptional permeability and low levels of private car use within the settlement. This requirement is again specifically included in the policy, and contributes to the exceptional circumstances for the release of this land from the Green Belt;
- The masterplans and detailed design process for Policies AL/CA3/ AL/PW1 and AL/CA1 will create open space and improve existing, or deliver new, landscape buffers (with built development set back from boundaries) within the new developments to ensure the openness of the surrounding areas remaining within the Green Belt is not compromised (as well as providing areas of amenity space within the allocated areas). Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach;

6.49 Based on the above approach and outcomes, it is therefore considered necessary to consider whether sites located within the Green Belt are suitable to deliver development in order to meet the development targets of the new Local Plan.

6.50 For each site allocation in the Local Plan where it is proposed to amend the Green Belt boundaries (a site allocation can comprise one or more sites), a detailed assessment process has been carried out to identify site-specific circumstances to support this release of land from the Green Belt. This has been an iterative process, taking account of the specific circumstances of the site(s), the proposed development to be delivered, and mitigation to be provided. This assessment process is set out below.

Identifying land in the Green Belt for release and Local Plan allocation

- 6.51 The assessment carried out to identify land in the Green Belt for release follows a three stage process. The Green Belt Study identified and assessed both ‘broad areas’ and smaller ‘parcels’ of land. This was followed by a detailed assessment of individual sites using the outcomes and recommendations of the Green Belt Study as part of the wider site assessment carried out for all sites through the SHELAA process.
- 6.52 The Green Belt Study Stage 1 is a strategic assessment of the Green Belt in the borough in the context of the wider MGB and Green Belt within adjacent local authorities. It was undertaken in relation to the contribution of areas of land (‘broad areas’) to each of the five Green Belt purposes (NPPF para 134).
- 6.53 The Stage 1 study identified for each broad area whether it was considered to provide a strong contribution to each of the Green Belt purposes, suggested 33 parcels and 10 broad areas for assessment at Stage 2, as well as providing an overview for each parcel and broad area of the main considerations that would need to be taken account of when carrying out a Stage 2 assessment.
- 6.54 The Stage 2 assessment (which was carried out by the same consultants as Stage 1) comprised a more detailed and focused review of the 33 parcels and 10 broad areas of land around identified settlements. An overall rating was given to each parcel to indicate the level of harm that could be caused to the Green Belt were the area in question to be released from the Green Belt, rating the contribution to purposes 1 to 4 of the Green Belt on a five-point scale from high to low. The fifth purpose (to assist in urban regeneration by encouraging the recycling of derelict and other urban land) was not assessed as all land was considered to make an equal contribution to this purpose).
- 6.55 The outcomes from the Stage 1 and 2 Studies were taken full account of as part of the site assessment process, when drawing up site allocation policies for sites located within the Green Belt and when making decisions to amend Green Belt boundaries.
- 6.56 Therefore, in addition to the detailed site assessment process described in the SHELAA Report, for all sites located in the Green Belt the following additional assessment work was carried out:
- An analysis of the percentage of the site in the Green Belt;
  - A review of the outcomes of the Green Belt Study to determine, by broad area and/or by smaller parcel as appropriate, the contribution(s) made by each site area included within a proposed site allocation area towards Green Belt criteria. Each site was considered in terms of how it currently functions/contributes towards the first four Green Belt purposes. Outcomes of the Green Belt Studies Stages 1 and 2 were used to inform this process, including an assessment of

how localised any impact of proposed development would be upon the immediate surrounding Green Belt compared with any impact upon the wider area, particularly in terms of retaining the openness and permanence of adjacent Green Belt areas (ref para 133 NPPF) (but not including a landscape assessment – this is not a Green Belt consideration; landscape assessments have been included within the wider site assessment process);

- A review of the outcomes of the Green Belt Study to determine the existing Green Belt boundary strength and if this can be strengthened and made more permanent through development opportunities;
- Review, against Table 6.2 Potential Beneficial Uses of Green Belt (Stage 2 Assessment), what possible contributions development included in a proposed allocation can make to Green Belt objectives in terms of improving access, providing locations for outdoor sport, landscape and visual enhancement, increasing biodiversity, and improving damaged and derelict land.

6.57 The outcomes of this process were used to reach a conclusion about the suitability of an individual site to be released from the Green Belt and to then identify and formulate specific criteria to be included in site allocation policies to:

- a) minimise the impact of development proposals upon the surrounding Green Belt, taking into account the proposed type and scale of development as well as the site allocation's relationship with adjacent areas, topography, landscape features etc, to include policy requirements for new and/or additional landscape buffers, as well as provision of open spaces within the site allocation area;
- b) identify those types of development that can contribute to Green Belt objectives and their most appropriate location within the allocation; and
- c) provide opportunities for delivery of strategic infrastructure and/or betterment, for example to alleviate flood risk/provide opportunities for improved surface water management, provision of improvements to health facilities that serve both this borough and the wider area.

6.58 For the two areas involving a relatively large release of land from the Green Belt, being site allocation policies AL/PW1 and AL/CA3 Land at Capel and Paddock Wood (release of approx. 148 ha of land in the Green Belt) and AL/CA1 Tudeley Village (release of approx. 168 ha of land in the Green Belt), the outcome of the assessment of the potential of land borough-wide to deliver a garden settlement (as explained in the Garden Settlement section of this Topic Paper above, is fundamental in supporting the release of Green Belt land at these two locations.

6.59 The assessments undertaken to determine the most appropriate locations for a garden settlement were unable to identify sufficient suitable and deliverable land in areas wholly outside of the Green Belt. The SHELAA and Sustainability Appraisal sections in this Topic Paper provide further details regarding this.

6.60 Having undertaken this process, the Council considers that there are exceptional circumstances to alter the boundaries of the Green Belt to remove land from the

designation in order to enable the Local Plan to include proposals for development in the Green Belt that fall under the following headings:

- Release of areas of land at Paddock Wood (located within the eastern part of Capel parish, Allocation Policy AL/CA3 and AL/PW1) and at Tudeley (located within Capel parish, Allocation Policy AL/CA1) for a wide range of land uses, including built development to deliver strategic development opportunities.

The land to be released from the Green Belt at Paddock Wood is part of a wider release of non Green Belt land to deliver development in a sustainable location; approximately 48% of the total area of land included in Policies AL/PW1 and AL/CA3 is currently designated as Green Belt. The masterplans and detailed design process for Policies AL/CA3, AL/PW1 and AL/CA1 will create open space and improve existing, or deliver new, landscape buffers (with built development set back from boundaries) within the new developments to ensure the openness of the surrounding areas remaining within the Green Belt is not compromised (as well as providing areas of amenity space within the allocated areas). Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach;

- A number of brownfield sites on the edge of settlements

The development of such areas as part of a wider site allocation supports the fifth purpose of the Green Belt (para 134 NPPF), this being to assist in urban regeneration, by encouraging the recycling of derelict and other urban land; an approach that is pertinent for this borough with a finite supply of urban land available for redevelopment;

- Individual site allocations located on the edge of settlements.

Individual (mainly smaller scale) sites have been identified as logical extensions to the existing LBD of a settlement, or as a 'rounding off' small local adjustment to the Green Belt boundary (and in some cases providing a stronger Green Belt boundary), and where all other planning considerations support the allocation, facilitating development in a sustainable location. For example, the release of Green Belt land at a number of locations at Pembury will provide a range of development opportunities, including housing and community facilities, in a sustainable location;

- Extension to the main urban area of Royal Tunbridge Wells and Southborough (including in association with other sites not located in the Green Belt)

These are to deliver employment land to meet strategic development requirements in the Local Plan as well as land for leisure and recreation. This reflects the outcome of the Economic Needs Study (ENS) that recommended the expansion of Key Employment Areas, including that at North Farm/Longfield Road in Royal Tunbridge Wells. Additionally, the ENS recognised the area around the A21 highway improvements as a location for significant growth potential. Both of these areas are predominantly located within the Green Belt;

- Areas providing opportunities for delivering key strategic infrastructure



The prime example is land adjacent to the Tunbridge Wells Hospital at Pembury allocated to provide key medical facilities.

6.61 The table below provides a summary of proposed site allocation policies in the Local Plan that contain land currently within the Green Belt. For each site allocation a summary is provided of the development type(s) proposed and whether it is intended the land within the site allocation area remains or is removed (entirely or in part) from the Green Belt. The final two columns provide a summary relating to mitigation included in the policy criteria (full details provided by referencing the relevant site allocation policy) and a summary explanation to support the policy approach being taken. The detailed wording within each allocation policy ensures that mitigation will be provided as part of the delivery of development.

6.62 The approach being taken for each allocation has been informed by the outcomes and recommendations of the process described above, taking account of the outcomes of the Green Belt Study at a site specific level as well the usual assessment of planning opportunities and constraints.

<b>Details</b>	<b>Development</b>	<b>Green Belt Outcome</b>	<b>Mitigation</b>	<b>Rationale</b>
<b>AL/SP1 Land west of Speldhurst Road/south of Ferbies</b>  Site 231 (one site)	Residential	Remove from Green Belt	Retain hedges/trees along boundaries; landscape buffers to site boundaries	Localised impact; well related to existing development; sustainable location
<b>AL/SP2 Land north of Langton House</b>  Site 416 (one site)	Safeguard for future school expansion including recreation	Remain in Green Belt	Retain hedges/trees along boundaries; landscape buffers to site boundaries	Localised impact; delivers strategic infrastructure; includes open space; sustainable location
<b>AL/SP3 Land adj Rusthall recreation ground</b>  Site 239 (one site) Planning approval granted	Recreation	Remain in Green Belt	Retain hedges, trees	Recreational provision (planning approval granted); sustainable location
<b>AL/PE1 Land rear High Street/west of Chalket Lane Sites 44,67,368,369,LS5</b> (5 linked sites)	Residential	Remove from Green Belt	Landscape buffer: LVIA required	Localised impact; creation of stronger boundary to Green Belt
<b>AL/PE2 Land at Hubbles Farm/south of Hastings Road</b>	Residential; safeguarding cemetery expansion	Remove part from Green Belt	Landscape buffer; LVIA required; safeguarded land to remain in MGB	Localised impact; creation of stronger boundary to Green Belt

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Details	Development	Green Belt Outcome	Mitigation	Rationale
<b>Sites 50, 390</b> (2 sites)				
<b>AL/PE3 Land north A21/south &amp; west of Hastings Road</b>  <b>Site 189</b> (one site)	Residential	Remove from Green Belt	Landscape buffer; LVIA required	Localised impact; creation of stronger boundary to Green Belt
<b>AL/PE4</b>  <b>Site 375</b> (one site)	Residential; safeguarding for medical expansion	Remove part from Green Belt	Safeguarded land to remain in Green Belt	A228 & Maidstone Road provides strong boundary to Green Belt
<b>AL/PE6 Land at Tunbridge Wells Hospital</b>  <b>Sites 444, LS13, LS136 plus land not submitted</b> (three sites plus other land)	Hospital/Medical Hub	Remain in Green Belt	Delivering key strategic medical infrastructure for west Kent and wider area	A21 provides strong Green Belt boundary; woodland to north creates strong boundary
<b>AL/PE7 Woodsgate Corner</b>  <b>Site 395</b> (one site)	Car showroom/employment	Small area of Green Belt to remain in Green Belt	Green Belt provides landscape buffers to western and northern site boundaries	Localised impact; provides employment in sustainable location
<b>AL/RTW12 Land adj to Longfield Road</b>  <b>Sites 57, LS43</b> (2 sites)	Employment uses	Remove part from Green Belt	Strategic landscape scheme	Provides employment in sustainable location; A21 provides strong MGB boundary; Well Wood to north marks Green Belt edge on adjacent development
<b>AL/RTW13 Land at Colebrook House</b>  <b>Site 101</b> (one site)	Employment uses	Remain in Green Belt	LVIA led scheme	Provides employment in sustainable location; A21 provides strong Green Belt boundary; Well Wood to north marks Green Belt edge on adjacent development
<b>AL/RTW14 Land at Knights Park</b>  <b>Sites 138,139,140</b> (3 sites)	Employment uses	Remove very small area from Green Belt	Green Belt to east is adjacent to existing employment uses	Most of site is Rural Fringe (not in Green Belt); to provide leisure & recreational uses
<b>AL/RTW16 Land at Wyevale Garden Centre,</b>	A1 Retail use	Remove part from Green Belt	Buffering/enhancement to landscape to north to strengthen boundary with	Railway to south provides strong boundary feature;

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Details	Development	Green Belt Outcome	Mitigation	Rationale
<b>Eridge Road</b>  Site 24 (one site)			Green Belt	improve weak northern boundary
<b>AL/RTW18 Land to west Eridge Road at Spratsbrook Farm</b>  Site 137 (one site)	Residential; secondary school	Remove from Green Belt	Buffering/enhancement to landscape to north to strengthen boundary with Green Belt	Strategic release to deliver secondary school facilities and residential in a sustainable location
<b>AL/RTW23 Land to north of Hawkenbury Recreation Grd Part Site 53</b> (one site) Planning approval granted	Recreation	Remain in Green Belt	Provision of landscape buffer	Recreational provision; sustainable location
<b>AL/RTW32 Land at Beechwood Sacred Heart School</b> SALP site/ Planning approval granted	C2 Use – very small area to be removed from Green Belt	Remove small area on southern boundary		Site Allocation in SALP 2016 with planning approval for development
<b>AL/SO3 Land at Mabledon &amp; Nightingale</b>  Site 445 (one site)	Development to follow farmstead approach	Remain in Green Belt	Delivery of specific areas through farmstead approach; exemplar scheme	Green Belt designation prevents countryside encroachment; gap between urban areas of Southborough & Tonbridge
<b>AL/SO4 Land at Mabledon House</b>  Site 90 plus additional land (one site plus)	Redevelopment of listed building and historic park & garden to provide hotel and leisure facilities	Remain in Green Belt	All proposals to demonstrate exceptional circumstances supported by evidence of need to support development within this location	Redevelopment of existing listed buildings; historic park & garden; sustainable location
<b>AL/PW1 Land at Capel &amp; Paddock Wood</b>  A number of sites as listed in policy	Urban extension: mixed use	Remove from Green Belt	To be delivered following garden settlement principles; master planned approach; provision of new/improved access to wider surrounding countryside	To provide strategic development opportunities; infrastructure led; betterment
<b>AL/CA1 Tudeley Village</b>  Site 438 (one site)	New garden settlement	Remove from Green Belt	To be delivered following garden settlement principles; master planned approach; provision of new/improved access to wider surrounding countryside	To provide strategic development opportunities; infrastructure led; betterment (flood mitigation)
<b>AL/CA2 Land to</b>	Secondary school	Remain in		Delivery of

Details	Development	Green Belt Outcome	Mitigation	Rationale
east of Tonbridge/west of site for Tudeley Village  Sites 447 & 454 (2 sites)		Green Belt		strategic infrastructure
AL/CA3 Land at Capel & Paddock Wood  A number of sites as listed in policy	Urban extension: mixed use	Remove from Green Belt	To be delivered following garden settlement principles; master planned approach; provision of new/improved access to wider surrounding countryside	To provide strategic development opportunities; infrastructure led; betterment (flood mitigation)

6.63 The more detailed table in Appendix 1 provides, for each site allocation, a summary of the outcomes of the Green Belt Study, the proposed hectares to be removed from the Green Belt and the outcome and recommendations of the Green Belt Study.

6.64 It is not proposed that the Local Plan designates other land as replacement Green Belt in place of that to be removed from the Green Belt, but rather to set out how compensatory improvements to the environmental quality and accessibility of remaining Green Belt land can be made.

6.65 This approach follows the guidance provided by the updates (July 2019) to PPG in relation to the Green Belt that requires, where it has been demonstrated that it is necessary to release Green Belt land for development, that compensatory improvements are made to the environmental quality and accessibility of the remaining Green Belt land. Policies are included in the Local Plan to ensure that such improvements are delivered, with a specific requirement in Policies AL/PW1 and AL/CA3 for such proposals to be agreed and secured through the masterplanning approach.

6.66 Paragraphs 138 and 139 of the NPPF provide requirements and guidance for drawing up and defining Green Belt boundaries. The above sections have explained that a number of sites and broad areas that include Green Belt are being allocated for development in the Local Plan. In some of these circumstances it is proposed to redraw Green Belt boundaries, following an approach that takes account of the NPPF requirements and the recommendations of the Green Belt Study:

- Where an area of land is to be removed from the Green Belt, all new boundaries have been drawn to be clearly defined, as far as is possible, using physical features that are readily recognisable and likely to be permanent. These have included roads, rail and trackways, field boundaries, and boundaries to Ancient Woodland;

- A number of sites in the Green Belt have been allocated to provide safeguarded land for future educational, medical, and community uses. These sites will remain, in their entirety, within the Green Belt;
- A number of sites in the Green Belt have been allocated to deliver uses that are considered as not being an inappropriate use in the Green Belt, with reference to the examples given in para 146 of the NPPF. These sites will remain, in their entirety, within the Green Belt unless the use is part of a wider mixed use scheme;
- A number of sites that it is proposed to release from the Green Belt include a policy requirement to retain and enhance significant landscape buffers along the boundaries and these buffers are indicated as such on the site plans. This will ensure a long term permanent and strong boundary for the new inner Green Belt boundary (for example, a major road route running alongside the boundary of a site), in some cases more so than is currently the case;
- Where the above approach has resulted in a small area of Green Belt land being enclosed (or almost surrounded) by non-Green Belt land, this small area has also been taken out of the Green Belt to create a smoother and more logical long-term boundary.

## **G) Further consideration of development potential in the High Weald AONB**

- 6.67 This section explains how the Council has assessed development potential within the High Weald Area of Outstanding Natural Beauty (AONB) to contribute to meeting identified housing and economic development needs.
- 6.68 The High Weald AONB covers some 69% of the borough and “washes over” many settlements, including Hawkhurst and Cranbrook. It also wraps around the main urban area of Royal Tunbridge Wells and Southborough.
- 6.69 Given this high coverage of the borough, and that AONBs are nationally important landscapes, it follows that particularly careful attention should be given to ensuring that development provisions in the Local Plan have the necessary regard to relevant legislative and national policy requirements, as well as to impacts on the local landscape character, in relation to the High Weald AONB.
- 6.70 The section is presented in a sequential manner as follows:
- High Weald AONB
  - National policy
  - Overall approach
  - Determining whether developments are ‘major’
  - Application of the ‘exceptional circumstances’ tests
  - Overview
- 6.71 Following the two initial sub-sections which provide contextual details about the AONB itself and the relevant legislation and national planning policies, the Council’s approach to the consideration of AONB impacts for all sites is set out. Of note, for all developments in an AONB, irrespective of size, this gives ‘great weight’ to conserving and enhancing its landscape and scenic beauty.
- 6.72 In addition, having regard to the much stricter tests in national policy for more substantial, ‘major’ developments in AONBs, all proposed sites in the AONB are firstly reviewed to determine whether their development should properly be regarded as major in AONB terms. Those major developments are then examined, along with the wider context, to determine whether there are ‘exceptional circumstances’ that would justify their allocation in the Local Plan. The final sub-section provides a concluding overview of the findings.

### High Weald AONB

- 6.73 The High Weald was designated as an AONB in 1983. It is an historic landscape formed from a deeply incised, ridged and faulted landform of clays and sandstone, with numerous gill streams. It is highly wooded, framing a still largely medieval pattern of small, irregular fields, typically used for grazing. The historic settlement pattern is one of scattered farmsteads and late medieval villages.
- 6.74 It is the fourth largest AONB in the country, with an area of 1,461 sq km, spanning eleven Districts and four Counties. Some 16% of the AONB falls within Tunbridge Wells borough. Its local extent can be seen on Figure 2 in the Development Constraints section above.

- 6.75 The High Weald AONB Management Plan which guides the shared approach to its conservation and enhancement has recently been reviewed, resulting in approval of the current Management Plan 2019-2024.

National policy

- 6.76 The legislative basis for the consideration of AONBs is set out in the Countryside and Rights of Way (CROW) Act 2000. Section 85 (1) states:

*(1) “In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”*

- 6.77 Paragraph 172 of the National Planning Policy Framework (NPPF) sets out the Government’s policy on how this statutory duty to have regard to AONBs should be met through the planning system. It states:

*“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads<sup>54</sup>. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development<sup>55</sup> other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

*a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*  
*b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*  
*c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

- 6.78 Footnote 55 directly relates to the definition of ‘major’ development for the purposes of the assessment. It states:

*“For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”*

- 6.79 The general approach to the distribution of development in the NPPF, as highlighted in the previous NPPF paragraph, 171, is that local planning authorities should favour allocating land “with the least environmental or amenity value, where consistent with other policies in this Framework”.

- 6.80 There is also advice contained in the Planning Practice Guidance. Of particular note:

- In relation to plan-making, paragraph ID: 61-043-20190315 states that: ‘All planning policies and decisions need to be based on up-to date information about the natural environment and other characteristics of the area including drawing, for example, from ... Areas of Outstanding Natural Beauty Management Plans ...’



- Paragraph ID: 8-040-20190721 elaborates, noting that AONB Management Plans ‘... may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications.’
- Paragraph ID: 8-039-20190721 clarifies that the duty to have regard to the purposes for which AONBs are designated is relevant in considering development proposals that are situated outside AONB boundaries, but which might have an impact on their setting or protection. Some elaboration is provided by Paragraph ID: 8-042-20190721.
- Paragraph ID: 8-041-20190721 relates directly to ‘How should development within National Parks, the Broads and Areas of Outstanding Natural Beauty be approached?’ It states:

*‘The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated.*

*All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality. Where applications for major development come forward, paragraph 172 of the Framework sets out a number of particular considerations that should apply when deciding whether permission should be granted.’*

#### Overall approach

- 6.81 In order that ‘great weight is given to conserving and enhancing landscape and scenic beauty’, it is necessary to appreciate the defining characteristics that make the High Weald AONB nationally important. These are set out in the ‘Statement of Significance’ in the High Weald AONB Management Plan 2019 - 2024. It states:

#### **‘The natural beauty of the High Weald comprises**

■ **Five defining components of character** that have made the High Weald a recognisably distinct and homogenous area for at least the last 700 years.

**1. Geology, landform and water systems** – a deeply incised, ridged and faulted landform of clays and sandstone with numerous gill streams.

**2. Settlement** – dispersed historic settlement including high densities of isolated farmsteads and late Medieval villages founded on trade and non-agricultural rural industries.

**3. Routeways** – a dense network of historic routeways (now roads, tracks and paths).

**4. Woodland** – abundance of ancient woodland, highly interconnected and in smallholdings.

**5. Field and Heath** – small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths, and inned river valleys.

■ **Land-based economy and related rural life** bound up with, and underpinning, the observable character of the landscape with roots extending deep into history. An increasingly broad-based economy but with a significant land-based sector and

*related community life focused on mixed farming (particularly family farms and smallholdings), woodland management and rural crafts.*

■ **Other qualities** and features that are connected to the interaction between the landscape and people and which enrich character components. Such qualities and features enhance health and wellbeing, and foster enjoyment and appreciation of the beauty of nature. These include locally distinctive features which enrich the character components such as historic parks and gardens, orchards, hop gardens, veteran trees, along with their rich and varied biodiversity, and a wide range of appealing and locally distinctive historic buildings including oast houses, farm buildings, Wealden Hall houses and their associated features such as clay-tile catslide roofs. People value the wonderful views and scenic beauty of the High Weald with its relative tranquillity. They appreciate the area's ancientness and sense of history, its intrinsically dark landscape with the opportunity to see our own galaxy – the Milky Way – and the ability to get close to nature through the myriad public rights of way.'

6.82 The High Weald Unit (the Executive of the High Weald Joint Advisory Committee) has provided a series of GIS layers which relate to these defining character components:

- Water systems data (watercourses, ponds, reservoirs and openwater)
- Geology data (bedrock geology and sandstone outcrops)
- Settlement data (historic settlement pattern and historic farmsteads)
- Historic routeways data
- Woodland data (ancient semi-natural woodlands and plantations on ancient woodland site)
- Field and heath data (historic field boundaries, heathland, wildflower grassland)

6.83 These layers, coupled with a site visit by a planning officer, have been used to assess submitted sites and to help understand the likely landscape and other environmental effects of the development on the AONB. The Borough Council supplements these in its assessment framework with the following sources of information, calling on support from specialist landscape, biodiversity and heritage officers as necessary:

- Public Rights of Way (KCC)
- Borough Wide Historic Landscape Characterisation Study (TWBC Study)
- Historical Ordnance Survey mapping (TWBC GIS)
- Aerial photography - recent and historical (TWBC GIS)
- Designated heritage sites such as Historic Parks and Gardens, listed buildings, conservation areas, areas of archaeological potential etc. (TWBC GIS)
- The Historic Environment Record (KCC)
- Borough Landscape Character Assessment (TWBC)
- Landscape Sensitivity Studies – where available (TWBC)
- Kent Habitat Survey 2012 (KCC)
- Designated wildlife sites (Natural England, KCC, KWT and TWBC)
- Provisional Inventory for Ancient Woodland (TWBC, Natural England)
- Priority habitats and species records (Kent and Medway Biological Records Centre)

- 6.84 The Borough Council draws on this information to inform its assessment of the suitability of sites through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process – see SHELAA document.
- 6.85 In terms of giving great weight to the AONB's defining characteristics, the Council takes the view that, where development is considered likely to cause significant harm to the defining character of the AONB (also having regard to potential mitigation) or cause harm disproportionate to likely benefits of the scheme, then that development will be very unlikely to be supported. This approach is applied irrespective of the size of the proposed development.
- 6.86 It cannot be guaranteed that adverse impacts to AONB interests will always be avoided. Indeed, planning judgements, in line with national policy, require a range of considerations to be balanced. However, in this balancing exercise, national policy also makes clear the 'great weight' to conserving and enhancing AONBs.
- 6.87 This 'great weight' is followed through in the SHELAA process of assessing the many sites that have been submitted for consideration in response to the 'call for sites'.
- 6.88 The assessment of major development proposals is undertaken on an individual site basis against the exceptional circumstances criteria, while also having regard to the overall housing needs for the borough. At the borough-wide level, this means that the consideration of major development potential only comes into play when the opportunities for meeting overall development needs outside the High Weald AONB have been thoroughly explored.
- 6.89 While it may be that some major developments can meet the exceptional circumstances threshold, the Council does not consider that the High Weald AONB could be a suitable location for strategic growth, such as a new or significantly expanded settlement. On this basis, all such proposals in the AONB that were put forward to the Council have been rejected as not being 'reasonable options'.

Determining whether developments are 'major'

- 6.90 Although the wording of paragraph 172 of the NPPF, as reproduced above, only refers to the consideration of 'major' developments in terms of planning applications, it is considered appropriate for the approach to Local Plan allocations to be consistent with that of determining planning applications.
- 6.91 An assessment matrix is used to inform the decision on whether potential site allocations are 'major'. This adopts the four factors in NPPF footnote 55:
- *Nature of development*
  - *Scale*
  - *Setting*
  - *Significant adverse impact on AONB purposes*
- 6.92 The basis of each of these assessments is elaborated upon in Appendix 2. It is stressed that none of the factors are considered in isolation or in a prescriptive way, but inform a rounded assessment of whether a proposed development is major. The results of the respective assessments against each of the above NPPF considerations are drawn together by experienced planning officers in making a judgement on whether a development is major. While this is a matter of judgement, it is based on experience in the local context, using the above assessment framework

to ensure a consistent approach with the NPPF, and to the treatment of sites in the Local Plan.

6.93 Assessment sheets for each of the proposed allocations in the AONB are provided as Appendix 3. It can be seen that, of the 49 site allocations in the AONB that are being put forward for inclusion in the Draft Local Plan, only about one third, 17, are considered to be ‘major’ in their local context.

6.94 Hence, for the greater part, the focus is on smaller developments. This is in line with the ‘indicator of success’ for Objective S2: ‘To protect the historic settlement pattern and character of settlement’ of the AONB Management Plan, which seeks:

*“Greater proportion of new homes delivered through redevelopment or small developments”*

6.95 Most of the ‘non-major’ sites for housing fall between 10 and 30 units, with just two having a potential maximum above this of 45 and 60 respectively. However it should be noted that one relatively small site of 35-45 dwellings is considered ‘major’, in part due to its close relationship with characteristic AONB features. The proposed allocations that are considered to be ‘major’, as set out in Appendix 2 and 3, are highlighted in the table below:

<b>SITE POLICY REFERENCE</b> (call for sites and late site references and SALP <sup>20</sup> )	<b>SITE ADDRESS</b>	<b>DEVELOPMENT PROPOSED</b>
<b>Royal Tunbridge Wells</b>		
<b>RTW 12</b> – (57 and LS 43)	Land adjacent to Longfield Road	Employment
<b>RTW 13</b> – (101)	Land at Colebrook House, Pembury Road	Employment
<b>RTW 18</b> – (137)	Land to the west of Eridge Road at Spratsbrook Farm	Housing (270 units) and a secondary school
<b>Southbrough</b>		
<b>SO 3</b> – (445)	Land at Mabledon and Nightingale	Housing (50-120 units)
<b>Cranbrook and Sissinghurst</b>		
<b>CRS 4</b> – (430)	Turnden Farm, Hartley Road	Housing (160-170 units)
<b>CRS 6</b> – (59, 70, 323, 345, LS53)	Gate Farm, adj Hartley Road and Glassenbury Road	Housing (90 units)
<b>CRS 7</b> – (LS 32)	Land off Golford Road	Housing (150 units)

<sup>20</sup> SALP – Site previously included in Site Allocations Local Plan 2016

<b>SITE POLICY REFERENCE</b> (call for sites and late site references and SALP <sup>20</sup> )	<b>SITE ADDRESS</b>	<b>DEVELOPMENT PROPOSED</b>
<b>Hawkhurst</b>		
<b>HA 1 – (115)</b>	Land forming part of the Hawkhurst Golf Course to the north of the High Street	Housing (400-450 units)
<b>HA 4 – (413)</b>	Land at Fowlers Park	Housing (100 units)
<b>HA 6 – (78, 419)</b>	Land at Copthall Avenue and Highgate Hill	Housing (70-79 units)
<b>HA 8 – (102)</b>	Hawkhurst Station Business Park Gills Green	Employment
<b>HA 9 – (422)</b>	Land at SanTERS Yard, Gill's Green Farm	Housing (38 units) and Employment
<b>Brenchley and Matfield</b>		
<b>BM 1 – (LS27)</b>	Land between Brenchley Road, Coppers Lane, and Maidstone Road	Housing (30-45 units)
<b>Pembury</b>		
<b>PE 1 – (44, 67, 368,369, LS5)</b>	Land to the rear of High Street and west of Chalket Lane	Housing (70-80 units)
<b>PE 2 – (50, 390)</b>	Land at Hubbles Farm and south of Hastings Road	Housing (90 units)
<b>PE 3 – (189)</b>	Land north of the A21, south and west of Hastings Road	Housing (90 units)
<b>PE 6 – (444, LS 13, 136)</b>	Land at Tunbridge Wells Hospital and adjacent to Tonbridge Road	Medical related development.

Application of the 'exceptional circumstances' tests

- 6.96 As highlighted under National Policy above, in line with NPPF paragraph 172, major development proposals should only be included in the Local Plan if it can be concluded that there are exceptional circumstances to override the presumption against such developments.
- 6.97 To recap, this paragraph states:
- 'Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
  - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*

*c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'*

- 6.98 These tests, or rather, considerations, are taken to require the Council to not only find that there are exceptional circumstances that justify a proposal, but also whether to do so would be 'in the public interest'.
- 6.99 Also, while the three bullet points are broad-ranging, it is noted that they do not exclude other considerations. Indeed, particularly in the local context, it is considered that, rather than just having regard to the degree of any detrimental effect, this can be broadened to have regard to the opportunities provided for enhancement, which may relate to heritage assets, community facilities, ecology and green infrastructure, as well as directly to landscape character.
- 6.100 In terms of defining exceptional circumstances and public interest, the particular circumstances of the individual proposals are critical. At the same time, a wider perspective is taken, notably in relation to the need for the development.
- 6.101 Therefore, the justification for those major allocations that are being proposed for inclusion in the Draft Local Plan is split into two elements; the first relates to factors that are local to Tunbridge Wells borough – which are set out below - and the second, to the details of individual proposals.

NPPF Test	Assessment
The need for development and economic implications	<p>There is a substantial housing need that cannot, sustainably, be met without at least some major development in the AONB, which covers nearly 70% of the borough.</p> <p>The delivery of housing to meet housing need is clearly in the public interest and, together with insufficient opportunities elsewhere, is regarded as an important factor in providing exceptional circumstances to justify major residential development in the AONB.</p> <p>There is a very high affordability ratio that is limiting access of local people to housing. Boosting overall supply, including through provision of a significant proportion of affordable homes for local people, will improve access to housing. The Strategic Housing Market Assessment identified a high need for affordable homes, relative to overall need, across the borough, as reviewed in the Housing Needs Assessment Topic Paper.</p> <p>It is also recognised that growth can help support local economies and local services, especially primary education.</p> <p>Economic vitality is a key objective for the borough, with sites close to the A21 trunk road (which runs through the High Weald AONB) providing the best opportunities for further employment provision, to ensure sustainable growth.</p>

NPPF Test	Assessment
<p>The cost of, and scope for, developing outside the AONB or meeting the need for it in some other way</p>	<p>All potential sites have been assessed as part of the SHELAA and Sustainability Appraisal. Both processes have given great weight to the conservation and enhancement of the AONB.</p> <p>The scope for developing outside the AONB has been fully realised. This includes promotion of both an expanded settlement and a new garden village in the Green Belt. A windfall allowance has also been included in supply calculations.</p> <p>There are a number of settlements wholly in, and “washed over” by, the AONB which are, to varying degrees, service centres. This includes Hawkhurst, Cranbrook, Benenden, Brenchley, Goudhurst, Lamberhurst, Matfield, Pembury, Sandhurst and Speldhurst. Therefore, it is inevitable that any development in these locations, even within the built-up area, would be in the AONB.</p> <p>Similarly, while the main urban area of Royal Tunbridge Wells/Southborough, and Pembury are excluded from the AONB, both have developed virtually up to the AONB; hence, further growth of what are sustainable settlements would almost certainly be in the AONB.</p> <p>Paddock Wood is the only town outside the AONB. This is being identified for major urban expansion, with some 4,000 further homes, in addition to the 1,000 in the current Site Allocations Local Plan. Furthermore, notwithstanding its Green Belt status, a garden village, at Tudeley (outside the AONB) is being proposed for some 2,500 homes, with 1,900 capable of being built in the plan period.</p> <p>It is concluded that all reasonable alternatives for locating development outside of the AONB are being pursued. Furthermore, it is evident that development to provide for homes and jobs at sustainable settlements within, or surrounded by, the AONB will need to be in the AONB.</p> <p>The merits of alternatives at each settlement are considered as part of detailed site-by-site assessments.</p> <p>Within these assessments, regard is given to the extent to which specific proposals incorporate particular elements, that contribute to their ‘exceptional circumstances’, such as provision of significant economic, community or green infrastructure benefits.</p>



NPPF Test	Assessment
Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated	<p>The merits of each proposed allocation are considered as part of the detailed site assessments in Appendix 3 and summarised below.</p> <p>These assessments include particular regard to the impacts on the key components of the AONB and the extent to which these are proposed to be moderated, or enhanced.</p> <p>While the NPPF requires the assessment of the effects of proposals on an individual basis, the cumulative effects of proposed allocations at settlements in the AONB, as well as their respective effects, are considered through the Sustainability Appraisal.</p> <p>The Council is also conscious of the potential net effect of all development within, and indeed close to, the AONB. It has identified that the number of dwellings on major developments proposed in the AONB amount to some 18% of all allocations. This may be compared to the 69% of the borough within the AONB. Also, in area terms, the amount of land proposed for development in the AONB totals some 155 ha of land; that is, approximately 0.68% of the total existing AONB area within the borough<sup>21</sup>, illustrating the weight given to the AONB and the “exceptional” nature of the allocations within the overall strategy, given the composition of the borough.</p>

- 6.102 At the individual site level, the impact on the AONB of proposed site allocations, and of alternatives, has been done through a site appraisal process conducted by planning officers, with the advice and assistance of landscape and conservation officers, to understand the existing site and context, the presence of notable and most importantly, AONB features, the likelihood of such features being adversely affected and the scope for not only moderating adverse effects but also noting what opportunities for enhancement that development could bring.
- 6.103 Consideration of these factors alone may, in the context of the wider justification for development in the AONB, lead to a conclusion that the site should be proposed for development, but there may also be other ‘exceptional’ reasons for a particular site that justifies or contributes towards the decision to allocate a particular site, which may, on balance, otherwise not be regarded as having sufficient justification in line with national policy.
- 6.104 This work is summarised for those sites considered to be ‘major’ in Appendix 2 and 3, which represents the professional opinion of the officers involved. As well as the reasons why a site is considered to be major, it sets out the key considerations and notes any mitigating factors and opportunities for enhancement that contribute, alongside the wider context, to the decision to propose that the site be allocated.
- 6.105 Whilst some sites assessed to be ‘major’ will clearly have special circumstances in relation to a specific identified need (e.g. medical/economic) and a limitation on alternative sites/provision that warrant allocation, other sites may be proposed to be taken forward through a combination of site specific and wider planning issues.

<sup>21</sup> Any allocations for safeguarded land have been excluded from these calculations, as are identified landscape buffers or green spaces included within site allocation boundaries.

- 6.106 Sites found to meet the relevant tests and suitable for allocation are normally those in a highly sustainable location, with limited negative effects on the wider AONB and/or AONB components and/or can make a positive contribution to AONB and landscape objectives and/or generate other wider public benefits, such as affordable housing and community infrastructure.
- 6.107 These conclusions and the proposed policies for each site are based on the currently available information and site visits by planning officers. Further, more detailed landscape and visual appraisals for the proposed 'major' development sites in the AONB will be carried out prior to the next, Regulation 19, version of the Local Plan, to inform the final allocations and requirements of site-specific policies.

#### Overview

- 6.108 The High Weald AONB is recognised as being a nationally, as well as locally, important asset. Every effort has been made to limit the extent as well as the impacts of development on it and especially on its distinctive characteristics on which its designation is based. For all proposals, not just those that are identified as 'major', an assessment has been made, and often rejected, on AONB impact grounds, having proper regard to the 'great weight' given to its conservation and enhancement.
- 6.109 In relation to major developments, only those proposals that are regarded as having exceptional circumstances to warrant their allocation in the light of exceptional circumstances that, in those instances, outweigh the fact that they are within the AONB are put forward.
- 6.110 The forthcoming Regulation 18 consultation will provide an opportunity to further consider the justifications for the developments being proposed in the AONB, and for rejecting other sites considered through the SHELAA process.

## H) Further consideration of development and flood risk

- 6.111 Tunbridge Wells Borough has an extensive and varied water environment and there are a number of key watercourses flowing through the area as well as areas of flood risk. Flood history shows that Tunbridge Wells Borough has been subject to flooding from several sources of flood risk, with the principal risk being from fluvial and pluvial sources, but also from surface water flooding. In accordance with the requirements of the NPPF and the NPPG, in relation to development and flood risk, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Government guidance requires that where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 6.112 The Borough Council has worked collaboratively with its consultants, officers of the Environment Agency and Kent County Council, as the Lead Local Flood Authority in developing the strategic distribution of sites proposed in the Draft Local Plan through the assessment work and formulation of the strategy as detailed below.

### Selection of sites

- 6.113 A Strategic Flood Risk Assessment (SFRA) has been produced to inform the Draft Local Plan and the distribution of development, including the proposed site allocations and policies contained within it. The SFRA has been prepared in two parts – a Level 1 SFRA for the whole borough and a Level 2 SFRA focusing on the land around Paddock Wood and East of the Parish of Capel.
- 6.114 Local Authorities, when preparing a Local Plan, should demonstrate that they have considered a range of site allocations, using a Strategic Flood Risk Assessment to apply the Sequential and Exceptions Tests where necessary. The Sequential Test should be applied to steer new development to areas with the lowest probability of flooding. The Flood Zones, which have been refined through new detailed modelling for the area as part of the production of the SFRA (and have been agreed and adopted by the Environment Agency for planning purposes) provide the basis for applying the Sequential Test.
- 6.115 The aim is to steer development to Flood Zone 1 (areas with low probability of river or sea flooding). Where there are no reasonable available sites in Flood Zone 1, guidance states that Local Planning Authorities should take into account the flood risk vulnerability of land uses and consider reasonable available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 and 2 should the suitability of sites in Flood Zone 3 (areas of high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

### The Level 1 Strategic Flood Risk Assessment

- 6.116 The Level 1 SFRA:
- Provides up to date information and guidance on flood risk for Tunbridge Wells Borough, considering the latest flood risk information in relation to up to date national policy

- Determines the variations in risk from all sources of flooding in Tunbridge Wells borough
- Assesses all potential sources of flooding and mapping of location and extent of functional floodplain (including detailed modelling to determine the extents)
- Assesses the standard of protection provided by existing flood risk management infrastructure
- Assesses the potential impact of climate change on flood risk
- Assesses locations where additional development may increase flood risk elsewhere
- Identifies critical drainage areas and recommendations on potential need for Surface Water Management Plans
- Identifies the requirements for site-specific flood risk assessments
- Determines the acceptability of flood risk in relation to emergency planning capability
- Considers opportunities to reduce flood risk to existing communities and developments

6.117 The Level 1 SFRA considers the sequential approach and how this should be carried out through the preparation of the Local Plan. It considers that the Sequential Test should be applied to the whole Local Planning Authority area to increase the likelihood of allocating development in areas not at risk of flooding. However, it is accepted that it is often the case that it is not possible for all new development to be allocated on land that is not at risk from flooding.

6.118 All of the sites across the borough that were submitted through the Call for Sites process have been screened against a suite of available flood risk information and spatial data to provide a summary of risk to each site (see Table 13-1 of the Level 1 SFRA). Information considered includes the flood risk datasets listed below and an indication is provided on the proportion of a given site affected by levels and types of flood risk.

- Flood Zones (present day)
- Future Flood Zone 3a in the 2080s epoch (Higher central and Upper end estimate)
- Risk of flooding from Surface Water
- Risk of flooding from Reservoirs
- Areas susceptible to Groundwater Flooding

6.119 The information provided in the above assessment informed the consideration of sites through the Strategic Housing and Economic Land Availability Assessment (SHELAA) following the sequential approach and was used to determine whether more detailed assessment of sites would be required as part of a Level 2 SFRA to further identify those sites that should be taken forward as potential development allocations.

6.120 The relatively extensive areas of land available for potential housing development in Zones 1 and 2 within the borough has made it possible to align the selection of housing land when performing the Sequential Test, so that all potential new housing sites can be located on land outside of the high-risk flood zone (Zone 3). Where potential housing sites are shown to comprise some land in a high-risk Flood Zone, proposed development will only be allowed to take place on land zoned as medium or low risk, and if appropriate any supplementary housing will be located on land immediately adjacent to the housing site on land in a medium or low risk zone.

- 6.121 In accordance with the Sequential Test and the Exceptions Test – those sites which are proposed to be allocated, that fall within or partly within areas of Flood Zone 2 or 3 have then been the subject of further work as part of the Exceptions Test carried out through the Level 2 SFRA.

The Level 2 Strategic Flood Risk Assessment

- 6.122 The Level 2 SFRA was carried out following the completion of the Level 1 SFRA (and combined within the final reporting), with the main purpose being to inform the selection of options for Local Plan allocations and ultimately to support the determination of planning applications. The work focused on the area around Paddock Wood and land to the east of Capel Parish in accordance with the requirements of the Exceptions Test.

- 6.123 Specifically, the work included the following elements:

- Up to date information and guidance on flood risk for Tunbridge Wells Borough, considering the latest flood risk information and the current state of national planning policy;
- An assessment of whether the principle of development could be supported at the proposed development locations (including consideration of cumulative impacts) that are located within Flood Zones 2 and 3 and therefore the need to apply the Exception Test as referred to above;
- Consideration of the flood risk management adaption, infrastructure or other measures needed to support delivery of the proposed development;
- An assessment of a refined set of 'land parcels' for potential development;
- Updated fluvial flood risk modelling;
- An assessment of possible strategic flood risk management measures and associated flood risk metrics.

- 6.124 The testing completed as part of the Level 2 SFRA provides a strategic understanding of the potential effect of development and the potential for mitigation by implementing flood risk management measures. A number of sites (later amalgamated as 'parcels' through the ongoing assessment work) have been considered and some were discounted during this process as having failed the Exceptions Test at that stage – i.e. development was not considered appropriate due to the extent of current flood risk or predicted future flood risk and thereby was not considered suitable for allocation and discounted from any further assessment/consideration.

- 6.125 At each of the ten proposed development parcels at Paddock Wood/Capel (proposed for built development as set out within the Draft Local Plan Policies AL/PW1 and AL/CA3 – Land at Capel and Paddock Wood), the strategic assessment generally shows that the principle of development can be supported. The proposed development, for the purpose of testing suitability has been positioned preferentially in lower fluvial flood risk zones within the parcels where possible, in accordance with the Sequential Test.

- 6.126 Consideration was also given to where flood risk management measures may be required in the future to manage flood risk in the borough (due to the influence of climate change on fluvial flood flows). It is considered that strategic provisions for future flood risk management may provide an opportunity to make a proposed development safe for the lifetime of the development, and the consideration of any off-set effects need to be considered. It was considered that some of the proposed

development configurations tested as part of this work, are shown to have notable influence on flood risk, both within development parcels but also on existing areas of development in Paddock Wood. Also some flood risk management measures have a large positive effect on flooding (e.g. depths and extents) in Paddock Wood, with the potential to provide 'betterment' for the existing settlement. It is acknowledged within the SFRA and the Draft Local Plan Policies that future and more detailed assessment work should refine understanding of how flood risk measures may reduce flood risk, and their viability.

- 6.127 As previously referred to, a number of technical documents support the main SFRA reporting, including the Flood Risk Management Measures Report (which sets out the possible flood risk management measures available and appropriate to mitigate flooding in the areas around Paddock Wood/Capel) and Supporting Technical Notes in relation to Flood Risk Management Measures costings, risk assessments and potential impact on existing properties/flood depths.
- 6.128 The amalgamation of the above work supports the allocation of sites within the Draft Local Plan and provides technical evidence which can be taken forward and used as part of detailed site considerations for the proposed allocated sites. This will be an integral piece of evidence for the masterplanning work to be taken forward for Paddock Wood/Land East of Capel, as this progresses in a comprehensive way.
- 6.129 It can be seen that regard to flood risk is a key consideration for the development provisions of the Local Plan. It will be a key issue going forward; hence, the Local Plan will also include a specific Flood Risk policy that requires that proposals for new development to contribute to an overall flood risk reduction, and only permit development where it would not be at an unacceptable risk of flooding on the site itself, and there would be no increase to flood risk elsewhere in accordance with the Sequential Test and Exception Test.

## I) Further consideration of Infrastructure provision

6.130 The Issues and Options Consultation Document included the following questions:

Question 6c: Have we identified the main infrastructure issues facing the borough? and

Question 6d: If No, what infrastructure issues do you think are missing?

6.131 The Council's initial response in the Consultation Document. was: *"The Council recognises that infrastructure provision and need is a critical issue highlighted across responses to the consultation. The responses identify issues and concerns regarding various forms of infrastructure including social/community, physical and green infrastructure. The Council will continue to positively engage with all relevant infrastructure authorities and agencies, having an ongoing relationship, in order to prepare a comprehensive infrastructure delivery plan which will sit alongside the new Local Plan as part of its delivery. Where sites are allocated for development the relevant policies will identify the necessary infrastructure that needs to be secured and put in place."*

6.132 The Local Plan places the delivery of infrastructure, both improvements to existing and provision of new, as a key component of its development strategy as prioritised within Strategic Objective 2 – *'To achieve the delivery of all forms of infrastructure to mitigate the impact of development and where possible result in 'betterment''*. Draft Strategic Policy STR5 – Essential Infrastructure and Connectivity reinforces this objective as well as draft Strategic Policy STR6 – Transport and Parking.

6.133 The growth strategy is based on the premise of infrastructure-led development to ensure that essential infrastructure and connectivity is integral to all new development. This includes the delivery of sustainable development of an appropriate scale to provide opportunities at the local level to meet housing needs and sustain local services and infrastructure, as well as the support for new facilities where required.

6.134 A Draft Infrastructure Delivery Plan has been prepared and will be published alongside the Draft Local Plan, which identifies all infrastructure requirements identified as a result of the new development proposals. Extensive consultation has taken place with service providers throughout the preparation of the Draft Local Plan to identify and determine any new infrastructure required as a result of the development proposed. This has been an iterative process and the Draft IDP reflects these discussions. The IDP Schedule sets out in detail the projects identified, costings where known, any identified funding, as well as the broad timescales for delivery, lead agencies and any funding gaps.

6.135 It is re-iterated that the IDP reflects a 'snapshot' in time and that infrastructure requirements, funding arrangements etc are subject to change and that the Draft IDP should be regularly reviewed and updated. However, in the meantime, the Draft IDP will enable the service providers to target areas of need and support the level of growth set out within the Plan in collaboration with the Borough Council.

6.136 For those areas of significant growth at Capel and Paddock Wood, there will be strategically planned infrastructure delivered as part of the masterplanning approach to delivering development. It is recognised that significant infrastructure provision is

a key element of the proposed development and is necessary in order to deliver the developments in a sustainable way. In recognition of this, the relevant infrastructure providers are expected to form part of the 'Strategic Sites Working Group' currently being formed to discuss and bring forward the proposed strategic developments.



## J) Sustainability Appraisal

- 6.137 Sustainability Appraisal recommendations have informed each stage in the Plan preparation. A Scoping Report and an Issues and Options (aka Interim) Sustainability Appraisal were produced alongside the preparation of the Issues and Options document. A Sustainability Appraisal (SA) has been prepared alongside the Draft Local Plan and will be published for consultation at the same time.
- 6.138 The SA assessed not only the five growth options included in the Issues and Options document, but also an option of not having a Local Plan, referred to as a “*business as usual approach*”: To recap, these were:
- (1) Focused Growth
  - (2) Semi-dispersed Growth
  - (3) Dispersed Growth
  - (4) Growth Corridor-led Approach
  - (5) New Settlement Growth
  - (6) Business as Usual Approach (No Local Plan)
- 6.139 The appraisals in the Issues and Options SA assumed that:
- a) For Growth Option 5, the new settlement would be located separately from existing settlements and in a location with existing sustainable transport options (or sustainable transport options will be provided as part of the development);
  - b) New schools would be built to accommodate both new and existing demands;
  - c) New development would bring about opportunities to improve deprivation;
  - d) There would be no net loss of existing publicly accessible green space;
  - e) Any change to flood risk as a result of implementing Growth Strategy 4 would be accounted for and mitigated.
- 6.140 All scenarios were based on meeting identified housing needs. It was not considered appropriate at the Issues and Options stage to consider an option in which the borough’s growth targets are only partially achieved. If it were subsequently found, through detailed site assessments, that not enough suitable and available land could be identified to meet the full housing needs, then scenario(s) that only meet a proportion of housing needs may be considered and presented in subsequent consultation stages of the Local Plan. Of course, the availability of suitable sites may also impact on the deliverability of certain development strategies.
- 6.141 At the scoping stage, each policy, strategy and site was assessed and scored to provide an indication of how well it contributes to each of the 19 sustainability objectives. Full details of this process are provided in Chapter 4 Methodology of the Sustainability Appraisal of the Draft Local Plan (‘the ‘Sustainability Appraisal’).
- 6.142 Once an overall score for each objective was determined, a scoring table was prepared that summarised the scores across all objectives and provided a written

commentary on the overall impressions of the policy, strategy or site, including ways in which adverse effects have been mitigated and beneficial effects maximised.

- 6.143 This scoring exercise was applied to four key elements of the Local Plan: strategic policies, potential development sites, development management policies and reasonable alternatives to all of these. Chapter 6 of the Sustainability Appraisal explains the process and methodology used to appraise the potential growth strategies for the Local Plan.
- 6.144 The Sustainability Appraisal concluded that all six scenarios (the five growth options in the Issues and Options consultation together with ‘business as usual, no Local Plan’ had positive and negative elements, it being difficult to provide an overall score for each one given the high-level nature of the alternatives under consideration and lack of future baseline and locational information.
- 6.145 The only clear conclusion that could be made was that alternative 6 (no Local Plan) was a far less favourable overall than the other options that would all provide for a planned growth approach.
- 6.146 It was noted that there was a slight preference for Growth Strategy 5 (new settlement growth) and that Growth Strategy 3 (dispersed growth) was slightly less positive than the other strategies. The option for new settlement growth, that has been taken to embrace an enlarged town or village based on garden settlement principles as well as a new freestanding settlement, is therefore proposed by the Sustainability Appraisal to be integral to the preferred strategy for the borough.
- 6.147 At the same time, it was recognised that it is unlikely that Growth Strategy 5 would be able to provide the full housing needs of the borough and it is likely that an approach that combines the principles of other strategies could be adopted.
- 6.148 While the scores for biodiversity and land use remain negative across Growth Strategy Options 1 to 4, those for education and equality could be improved by adopting an additional scaled-down version of Growth Strategy 4 (the second best strategy). Growth Strategies 1 to 3 produced largely similar outcomes, with Growth Strategy 3 being slightly less favourable overall.
- 6.149 Following the Issues and Options stage, two further alternative growth strategies were identified for consideration through the Sustainability Appraisal: increased growth, including making a provision for Sevenoaks District Council’s unmet need and dispersed countryside growth (including rural areas, not just existing villages). A possible third option, that is a growth strategy that only partially meets identified needs, was not considered to be a reasonable alternative in the context of the NPPF, as at this stage site assessment and associated SA work indicated that there is capacity in the borough to meet housing targets.
- 6.150 When appraising the strategy for increased growth, it was assumed that a garden settlement within the AONB would not be appropriate and that the Council had maximised development potential outside the High Weald AONB, including through

strategic Green Belt releases for both a new garden settlement and the major expansion of Paddock Wood. Furthermore, it was proposed that substantial growth is already being accommodated at Horsmonden, the other, more sustainable, settlement outside the AONB, as well as through maximising opportunities for intensification through allocations within the main urban area of Royal Tunbridge Wells and Southborough. Therefore, it was deemed reasonable to assume that the additional dwellings needed to meet Sevenoaks unmet need would essentially be in the AONB.

6.151 Similarly, achieving the pattern of smaller settlements through an option of dispersed countryside growth would mean increased development in more rural and tranquil areas, most of which is within the AONB.

6.152 In order to appraise the preferred growth strategy, a cumulative impact assessment was carried out of the total development proposed in each parish and the Main Urban Area of Royal Tunbridge Wells and Southborough. The outcomes of this are presented in Chapter 6 of the Sustainability Appraisal. Additionally, as well as alternatives for the development strategy as a whole, alternatives to specific key elements were considered. These were alternatives for the location and scale of development of a garden settlement, and for the location and scale of development of an urban extension.

#### Outcomes

6.153 The SA advises that an approach combining the most sustainable elements of Growth Strategy options 1-5 would be appropriate for maximising beneficial effects and minimising adverse effects.

6.154 In light of all of the SA findings, a preferred development strategy has been developed that has been scored using the same method as previously. This strategy embraces:

- Creation of a new garden settlement;
- A major urban extension based on garden settlement principles; (both of the above to involve some loss of Green Belt land);
- Maximisation of potential for growth outside AONB; and then
- Scope for some growth within AONB spread across a number of settlements.

6.155 This outcome is expected to deliver significant beneficial effects for most of the economic and social sustainability objectives. The environmental objectives were found to produce either highly mixed, neutral or negative scores, reflecting the increased pressures that a significant number of new dwellings would put upon sensitive environmental features such as landscape and heritage.

6.156 Because the requirement for a new garden settlement and large urban expansion were fundamental to the preferred strategy (Option 5 in Issues and Options consultation), being included with Option 4 (growth corridor) as the 'preferred'

outcome in the Issues and Options consultation and also likely necessary to meet development needs, the SA also considered alternative locations and scales for delivering these aspects of the final growth strategy. The findings of this process were that Tudeley village was the only reasonable location for a new settlement and that a scale limited by the flood risk to the north and the AONB to the south would be most preferred. This scale amounts to approximately 2,500 to 2,800 new dwellings (approx. 1,900 dwellings to be delivered within the current plan period), to include all the necessary infrastructure, open space etc.

- 6.157 For the urban extension, the findings were that Paddock Wood was the only reasonable location for such an extension and that a scale set away from the constraints in the south (Ancient Woodland and AONB), but with land take in the Green Belt to the west of Paddock Wood (land located within Capel parish) would provide a suitable scale of extension with benefits for the economic, environmental, and social elements of sustainability.
- 6.158 The consideration of which sites should be assessed by the SA in order to develop reasonable alternatives was undertaken using a similar filtering methodology to the SHELAA, taking into account locational (accessibility and sustainability) and environmental criteria. This filtering process resulted in a list of approximately 300 sites for the SA to assess.
- 6.159 Once SA assessments were completed, sites were grouped into parishes (or settlements for Royal Tunbridge Wells/Southborough) and a cumulative impacts assessment was undertaken for each parish/settlement, the findings being used to inform an overall cumulative assessment for all parishes and settlements in the borough.
- 6.160 This assessment provided the basis for deriving the key findings to inform Policy STR 1: The Development Strategy; that is, that significant beneficial effects were expected for most economic and social sustainability objectives from delivering development based upon the approaches set out in Policy STR 1. The environmental objectives were found to produce either highly mixed, neutral, or negative scores reflecting the increased pressures that a significant number of new dwellings would put upon sensitive environmental features such as landscape and heritage.
- 6.161 It is noted that the SA also contains a set of scores for STR 4, which is essentially an assessment of the individual site and cumulative impacts of all the Green Belt releases, including the two strategic allocations.
- 6.162 Appendix B of the SA provides details of the numerous mitigation measures proposed by the SA during the drafting of the Local Plan in order to mitigate adverse effects and enhance positive effects. The draft Local Plan being consulted on at Regulation 18 has taken all these recommendations into account when preparing the requirements of the strategic objectives and policies, site allocation policies, and development management policies.

6.163 The mitigation measures and recommendations made by the SA to inform the Local Plan's Strategic Objectives and Spatial Development Strategy are:

- The Local Plan should be guided by the availability of infrastructure;
- In rural areas, growth should be accompanied by improvements to services, facilities, and transport;
- An approach for growth combining elements of multiple strategies would be beneficial in helping to minimise negative impacts;
- Position a garden settlement in a location that is well outside the AONB, can achieve Accessible Natural Greenspace Standard, benefits a pocket of deprivation, draws traffic away from the AQMA, eliminates impacts from flooding; and provides employment opportunities for key wards.

### Conclusion

6.164 Table 73 in the SA presents the overall impacts of all elements of the Local Plan on each of the sustainability objectives, considering the results of the SA for the spatial development strategy alongside the strategic objectives and policies and the development management policies.

6.165 Overall, economic objectives score highly positive with a mixed score for services and facilities. Environmental objectives mostly score as mixed, with neutral scores for biodiversity and waste, and negative scores for landscape and land use. Social objectives score highly positively (plus a mixed score for travel).

6.166 The Sustainability Appraisal (SA) advises that the preferred development strategy approach in the Local Plan, which includes the creation of a new garden village, together with a major urban extension based on garden settlement principles, is expected to deliver significant beneficial effects for most of the economic and social sustainability objectives listed by the SA.

6.167 The environmental objectives are found to produce either highly mixed, neutral, or negative scores essentially reflecting the increased pressures that a significant number of new dwellings would put upon sensitive environmental features such as landscape and heritage. The SA also noted that this strategy involves some loss of Green Belt land, it being found unreasonable for such large-scale growth in the AONB. However, with a view to meeting housing needs, the SA noted that the strategy also seeks growth within the AONB, being spread across a number of settlements, having first maximised potential outside the AONB.

## 7. Summary and conclusions for the development strategy

- 7.1 The Local Plan has been prepared within the context of:
- Aiming to meet the identified level of development needs for the borough (housing, employment, retail, cultural, leisure) unless there are good planning reasons why this is not possible, supported by the necessary infrastructure provision within the planning context of a constrained borough;
  - Maximising development potential outside those areas of the borough constrained by national landscape designation (High Weald AONB) and the areas designated as Metropolitan Green Belt;
  - A plan-led approach delivering sustainable development, including all necessary supporting infrastructure, to be funded by development. To include strategic releases of land to be developed using a comprehensive masterplanning approach;
  - Identifying and reflecting local aspirations for growth and development, including those addressed in local strategies and policies within Neighbourhood Plans.
- 7.2 Paragraph 11 of the National Planning Policy Framework (NPPF) states that '*plans should positively seek opportunities to meet the development needs of their area*' and that '*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*'.
- 7.3 The extent to which development needs can be achieved, especially given the constraints to development that need to be assessed and considered in areas of the borough covered by designations, such as AONB and Green Belt, has been informed by the site assessment process (that has taken account of the outcome and recommendations of a broad evidence base) and bespoke consideration, as well as the outcomes of a Sustainability Appraisal.
- 7.4 In order to meet these development needs as far as possible in a planned and sustainable way and supported by new infrastructure, the development strategy in the Local Plan includes the allocation of areas for a new garden settlement and urban expansion (delivered through garden settlement principles). These areas will deliver a substantial proportion of the borough's development needs over the Plan period, as well as providing a stream of development beyond the current Plan period.
- 7.5 As shown in preceding sections, the Council identified different development strategy options. It has applied the evidence base outcomes and responses to the Local Plan Issues and Options consultation, as well as Sustainability Appraisal recommendations, to inform the current proposed development strategy.
- 7.6 The strategy meets the housing growth needs of the borough, based on a combination of dispersed housing growth at the majority of settlements across the borough that have defined Limits to Built Development, in conjunction with the delivery of a new 'stand alone' garden settlement and the transformational expansion

of an existing settlement – Paddock Wood (into Capel Parish), based on garden settlement principles.

- 7.7. At the same time, the employment growth needs of the borough are met by a development strategy based on more of a focus on larger settlements, with good access to the A21.
- 7.8 In terms of the overall scale of growth, the various assessments have found that the Plan is proposing as much development as could sustainably be accommodated. It is evident that there is no potential to meet any unmet housing needs arising in neighbouring Authority's areas. It proposes the planned provision of approximately 14,800 new homes over the 20-years plan period, together with the allocation of around 14 hectares of employment land in sustainable locations to provide for a mix of employment opportunities.
- 7.9 In terms of the distribution of development, having maximised the development potential of each site considered as suitable for sustainable development in locations outside of the AONB and Green Belt and following an assessment of the development potential of smaller (not 'major') sites located within the AONB, further assessments have been undertaken into the development potential of major development sites in the AONB, following the requirements of para 173 of the NPPF, and of potential sites in the Green Belt taking account of the requirements of paras 136 and 137 of the NPPF.
- 7.10 As a consequence, the development strategy:
- Identifies areas within the borough outside the AONB with potential to deliver development and maximises the development potential of these areas; land within Capel parish, at Paddock Wood and Tudeley, together with a comparatively lower level of development proposed at other areas outside the AONB; for example, at East End, Benenden (which includes redevelopment of brownfield sites), and also at Horsmonden, Frittenden, and Sissinghurst (proportionately more development is proposed in these areas than has been previously delivered);
  - Provides for the comprehensive expansion of the settlement of Paddock Wood (including land within Capel parish) following garden settlement principles, and for a new garden settlement at Tudeley within Capel parish to deliver significant development within this plan period and into the next plan period.
  - Recognises that the Main Urban Area of Royal Tunbridge Wells and Southborough has taken most residential development over previous Local Plans. The focus now is to balance this with employment and retail development (supported by the Employment Needs Study and Retail & Leisure Study), with a focus in the new Local Plan on delivering employment at the Main Urban Area. Also, it supports the growth and viability of Royal Tunbridge Wells town centre by providing enhanced employment, leisure, retail, and cultural provision.

- Recognises that the main rural settlements of the borough, Cranbrook and Hawkhurst, are both located within the AONB and so development here would necessitate allocation of land within the AONB, although some potential is evident;
- Elsewhere, provides for sustainable development of an appropriate scale at the smaller settlements, taking into account site assessment work, having regard to national AONB and Green Belt policies, which provide opportunities to meet local housing needs and sustain local services and infrastructure.



## 8. Delivering the proposed development strategy

- 8.1 The development strategy has been based on a thorough assessment of the availability, suitability, and deliverability of sites capable of contributing towards the development needs of the borough over the plan period together with key considerations.
- 8.2 Provision of necessary infrastructure has been a key consideration. A strategic policy on ‘essential infrastructure and connectivity’ will be prominent in the Local Plan, supported by detailed policies on specific forms of infrastructure, including green infrastructure, digital communications, transport, local shops and services, sports and recreation provision. Furthermore, the strategic policies for each parish/settlement include sections highlighting the infrastructure to be provided or contributed towards by development in that area. Individual site allocations provide further information on these requirements.
- 8.3 The anticipated timescale for the development of proposed site allocations are based on a rigorous methodology to ensure that the development targets are realistic. Details of this are set out in the Housing Supply and Trajectory Topic Paper<sup>22</sup>.

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<sup>22</sup> <https://beta.tunbridgewells.gov.uk/local-plan/evidence>

# APPENDICES

## Appendix 1: Assessment of Green Belt sites

Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
SP 1	Land to the west of Speldhurst Road and south of Ferbies	Yes	Allocation for 15-20 C3 dwellings - remove site from Green Belt	0.79	0.96	0.79	121.69%	15	20	18	24	SP1	weak/none	weak/none	relatively strong	weak/none	retain hedges/trees along site boundaries; landscape buffers to site boundaries :localised impact	well related to development; sustainable location;
SP 2	Land north of Langton House	No	Allocation for safeguarding future school expansion - do not remove from Green Belt	4.73	0.00	4.73	0.00%	0	0	0	0	LG1a	relatively strong	weak/none	relatively strong	weak/none	retain hedges/trees along site boundaries; landscape buffers to site boundaries :localised impact	potential uses: strategic infrastructure (school expansion, recreation) ; open space provision; sustainable location

# Distribution of Development Topic Paper for Draft Local Plan – Regulation 18 Consultation

Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
SP 3	Land adjacent to Rusthall recreation ground, Southwood Road	No	Allocation for additional recreation provision - do not remove from MGB	2.75	0.00	2.75	0.00%	0	0	0	0	RU1a	moderate	weak/non e	moderate	moderate	retain hedges/trees; LVIA	recreational provision (approval already granted); sustainable location; acceptable use in GB
PE 1	Land rear of High Street and west of Chalket Lane	Yes	Allocation for 70-80 dwellings - remove from Green Belt (landscape buffers to west remain)	6.45	9.64	6.74	143.11%	70	80	100	114	PE1	relatively weak	relatively weak	relatively weak	relatively weak	landscape buffer; LVIA: localised impact	GB Study: 'The A21 would represent a stronger boundary than the existing settlement edge'
PE 2	Land at Hubbles Farm and south of Hastings Road	Yes (part)	Allocation for 90 dwellings - remove from Green Belt except for west side (cemetery expansion)	5.34	4.64	5.49	84.60%	90	90	76	76	PE2	relatively weak	relatively weak	relatively weak	relatively weak	landscape buffer; LVIA; part safeguarded for cemetery expansion	GB Study: 'The A21 would represent a stronger boundary than the existing settlement edge'

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Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
PE 3	Land north of the A21, south and west of Hastings Road	Yes	Allocation for 90 dwellings - remove from Green Belt except for west side (cemetery expansion)	4.78	5.47	4.78	114.37%	90	90	103	103	PE3	relatively weak	relatively weak	relatively weak	relatively weak	landscape buffer; LVIA	GB Study: 'The A21 would represent a stronger boundary than the existing settlement edge'
PE 4	Land at Downingbury Farm, Maidstone Road	Yes (part)	Allocation for 25 residential dwellings. Safeguarded land for Hospice expansion to remain in Green Belt	4.76	4.68	4.94	94.79%	25	25	24	24	PE5	relatively weak	weak/non e	relatively weak	weak/none	safeguarded land for Hospice to remain in GB	GB Study: 'The A228 & Maidstone Road would constitute a strong GB edge'
PE 6	Land at Tunbridge Wells Hospital, Pembury and adjacent to Tonbridge Road	No	Allocation for Hospital/Medical Hub - do not remove from Green Belt	41.08	0.00	41.08	0.00%	0	0	0	0	PE6/B A2	moderate	moderate	relatively weak	weak/none	deliver key strategic medical infrastructure for West Kent (and wider)	GB Study: A21 forms strong boundary to west; woodland to north creates strong boundary

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Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
PE 7	Woodsgate Corner	No	Allocation for car showroom/employment uses. Area within Green Belt to remain in Green Belt	0.56	0.00	4.78	0.00%	0	0	0	0	PE1	relatively weak	relatively weak	relatively weak	relatively weak	increase tree coverage along boundaries (TPOs): localised impact; western boundary to remain in GB; employment in sustainable location	GB Study: 'The A21 would represent a stronger boundary than the existing settlement edge'
RTW 12	Land adjacent to Longfield Road	Yes (part)	Allocation for economic use - remove part of site from Green Belt	36.71	20.26	36.72	55.17%	0	0	0	0	TW4	moderate	weak/none	relatively weak	relatively weak	strategic landscaping scheme; employment in sustainable location	GB Study: A21 would constitute a stronger boundary to east; Well Wood to north marks GB edge on adjacent industrial estate

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Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
RTW 13	Land at Colebrook House, Pembury Road	No	Allocation for economic use - do not remove from Green Belt	7.71	0.00	7.71	0.00%	0	0	0	0	TW4	moderate	weak/ none	relatively weak	relatively weak	landscaping/ visual impact led; employment in sustainable location	GB Study: A21 would constitute a stronger boundary to east; Well Wood to n marks GB edge on adj ind estate
RTW 14	Land at the former North Farm landfill site plus smaller site to east	Landfill site was Rural Fringe. Remove land to east from Green Belt	Allocation for economic use - very small % in east to be removed from Green Belt	0.05	0.00	21.16	0.00%	0	0	0	0	TW3	moderate	weak/ none	relatively weak	relatively weak	most of site is Rural Fringe. Small area to east is adjacent to employment uses	most of site is Rural Fringe (not within GB) but included in GB Study; recreational uses: compatible use for GB

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RTW 16	Land at Wyevale Garden Centre, Eridge Road	Yes (part)	Allocation for A1 retail use - remove part of site from Green Belt	7.46	4.33	7.92	54.61%	0	0	0	0	TW11	relatively weak	weak/ none	moderate	relatively weak	buffering/en hancements to landscape to north to strengthen boundary with GB; sustainable location	GB Study: railway to south provides strong boundary feature; weak northern boundary
RTW 18	Land to the west of Eridge Road at Spratsbrook Farm	Yes	Allocation for 270 dwellings and school - remove from Green Belt	15.79	16.92	15.82	106.95%	270	270	289	289	TW10	relatively strong	weak/ none	relatively strong	relatively strong	buffering/en hancements to landscape to north to strengthen boundary with GB	strategic release to deliver secondary education facilities in a sustainable location together with residential
RTW 23	Land to the north of Hawkenbury Recreation Ground	No	Allocation for recreation provision - do not remove from Green Belt	7.07	0.00	7.10	0.00%	0	0	0	0	TW6a	moderate	weak/ none	moderate	moderate	landscape buffer	recreational provision (approval granted for playing pitches) ; sustainable location; acceptable use



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																		in GB
RTW 32	Land at Beechwood Sacred Heart School	Yes (part)	Allocation for C2 use - remove the very small % in the Green Belt from the Green Belt	0.05	0.00	0.67	0.00%	0	0	0	0	BA6	only southern small strip within Green Belt : n/a	n/a	n/a	n/a	Allocated site in Site Allocations Local Plan 2016	approval granted for development
SO3	Land at Mabledon and Nightingale (445)	No	To be delivered following farmstead approach - do not remove from Green Belt	N/A	N/A	N/A	N/A	0	0	N/A	N/A	BA1	strong	strong	strong	strong	delivery of specific areas through farmstead principles - exemplar scheme	GB prevents countryside encroachment/ gap between Southborough & Tonbridge - policy will deliver small scattered forms of development centred on Mabledon Farm

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Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
SO4	Land at Mabledon	No	Allocation for redevelopment for hotel/leisure - do not remove from Green Belt	12.58	0.00	12.62	0.00%	50	120	0	0	BA1	strong	strong	strong	strong	all proposed development to follow parameters set out by an agreed masterplan	GB prevents countryside encroachment/ gap between Southborough & Tonbridge - redevelopment of existing listed buildings/historic park & garden
PW1/ CA3	Paddock Wood Masterplan	Yes	Allocation for urban expansion to be delivered on garden settlement principles	123.97	148.19	307.79	48.15%	4000	4000	1926	1926	PW1, 4a, 4b, 5 BA3 & 4	PW1, 4a, 4b, 5 weak BA3 strong BA4 weak	PW1 relatively weak PW4a, 4b, 5 weak/ none BA3 & BA4 strong	PW1 moderate PW4a weak/ none 4b relatively strongPW5, BA3 & BA4 strong	PW1, PW4a 4b weak/none PW5, BA3 weak/ none BA4 relatively weak	To be delivered following garden settlement principles; master planned approach	GB contributes to gap between Tonbridge and Paddock Wood; extent of openness; floodplain constraint; distinction between Low and High Weald landscapes. Development to provide strategic development opportunities; infrastructure led; betterment

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Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
CA 1	Tudeley Village	Yes	Allocation for garden settlement	157.47	167.79	157.47	106.55%	1900	2600	2024	2770	BA2 & BA3	BA2 & BA3 strong	BA2 & BA3 strong	BA2 & BA3 strong	BA2 moderate BA3 weak/none	To be delivered following garden settlement principles; master planned approach	GB prevents countryside encroachment and as gap between Tonbridge & Paddock Wood. To provide strategic development opportunities; infrastructure led; betterment
CA 2	Land east of Tonbridge and west of Tudeley Village	No	Allocation for secondary school	32.33	0.00	32.33	0.00%	0	0	0	0	BA 3 & BA4	BA3 strong BA4 weak	BA3 & BA4 strong	BA3 & BA4 strong	BA3 weak/none BA4 relatively weak	delivers key infrastructure	GB contributes to gap between Tonbridge and Paddock Wood; extent of openness; floodplain constraint; distinction between Low and High Weald landscapes. Provide strategic infrastructure

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Site within MGB: update numbering	Policy Name	Removing from MGB	Rationale	Allocation Area within MGB	Hectares to remove from MGB	Site Size	Site % in MGB	Housing Min	Housing Max	Housing Min as % of site in MGB	Housing Max as % of site in MGB	GB Study 2 Parcel	GB Purpose 1: unrestricted sprawl	GB Purpose 2: prevent towns merging	GB Purpose 3: encroachment	GB Purpose 4: setting/character historic towns	Mitigation through policy criteria	notes
Total					382.87			6510	7295	4560	5327							
MGB Current Extent					7133.88													
% Lost					5.37%													

## Appendix 2: Factors in the assessment of whether development is major in AONB terms

1. The four factors set out in NPPF footnote 55 to be considered in the determination of whether development is major are:
  - *Nature of development*
  - *Scale*
  - *Setting*
  - *Significant adverse impact on AONB purposes*
2. These are expanded upon, in the Tunbridge Wells High Weald AONB context below.
3. The methodology applied in this framework has been subject to discussion with, and broad agreement by, Natural England, notwithstanding that it is likely to have “in principle” objections to major developments in the AONB. In this context, it is important to stress that this framework is merely to help the Council decide which NPPF policies are relevant to a particular proposal. It is not a framework for determining whether a proposals development is acceptable in AONB terms. That is a separate process.

### Nature of development:

4. Most proposed developments are wholly residential in nature, although there are some mixed use allocations (including one with a wholly new school) and some purely employment use proposals, as well as individual medical and a hotel proposals. There are also a few ‘safeguarding’ proposals, where land is effectively reserved for potential future recreational or educational purposes. In these latter cases, the assessment assumes that the safeguarded use occurs.
5. All of these uses, with the possible exception of recreational proposals, are anticipated to substantially comprise built form, with the Council expecting a (policy-compliant) high quality of design. However, consideration is also given to the likely form of proposals; for example, if a residential scheme has any blocks of more than 2/3 storeys; if an employment development proposal is for reuse or new development; if it is for smaller workspaces or larger warehouse-type “sheds”; if a hotel scheme is to be set within extensive grounds and/or retain landscape features.
6. Landscape conservation and/or enhancement measures that are integral to a proposal will not normally be considered under this factor, but would be relevant to the assessment of impact on the AONB’s landscape and scenic beauty.

### Scale:

7. ‘Scale’ is considered in both absolute and relative terms; that is, to both the actual size of the development and to the settlement to which it relates. Both measures are considered, as both are regarded as contributing to a person’s perception of whether a development is ‘major’.
8. Having regard to the landscape and settlement pattern of the High Weald AONB, any schemes involving 100+ dwellings, or 5 hectares of commercial use, would be viewed as ‘very substantial’, irrespective of its size to its local context. Therefore, and given the significance of absolute scale within the overall assessment, these will almost inevitably be major developments.

9. Smaller developments may also be classed as major, having regard to their relative scale (below) in conjunction with the other factors.
10. Relative scale is measured, if residential, by the number of dwellings anticipated in the development and those in the settlement (using property address point data) or, for other uses by the site area and area of the settlement (measured from the relevant Limits to Built Development).
11. The following banding is used as a guide in relation to relative scale:

Scale	Scale relative to settlement	Implications
<b>Very substantial</b>	More than 15%	Almost certainly going to be 'major'
<b>Substantial</b>	10-15%	Very likely to be 'major' unless other factors more favourable
<b>Moderately substantial</b>	5-10%	Less likely to be 'major' unless negative against other factors
<b>Not substantial</b>	Less than 5%	Not regarded as 'major' against this test (but may still be 'major' if substantial negative impact against other factors)

12. This banding does not imply an absolute mathematical relationship but is used to illustrate differences in relative scales. The bands are based on officers' experience of proposals within the High Weald AONB.

Setting:

13. 'Setting' commonly relates to the relationship of the site to its surroundings but in this case might also include aspects within the site itself. It normally relates to whether a site can be regarded as a natural extension of the main built-up area of a settlement, or whether it is more related to the countryside beyond a settlement. Hence, considerations include the existing pattern of development, land uses, physical features and topography, as well as the form of development in the context of the character of its setting.
14. For example, a site that is situated between existing built-up parts of a settlement and its development would take a similar form so is less likely to be 'major', whereas a site physically separated from or otherwise poorly related to existing development is more likely to be treated as 'major'.
15. It is considered helpful to differentiate the relationship between sites/developments and their settings on a scale: *Poorly related – Reasonably related – Well related*

AONB impact:

16. This is typically dependent upon the presence and effect of development upon typical components of AONB character and/or key characteristic features of the local landscape. It may also consider visual matters such as degree of exposure/containment, prominence, contribution to views etc. and setting of components or features outside the site boundary.

17. Consideration would be given as to whether effects could be avoided through applying buffers or policy wording. For instance, an allocation may well include an area of ancient woodland but by excluding the ancient woodland from the developable area, applying an appropriate buffer and requiring the development to improve management of the woodland, negative effects can be largely avoided and positive contributions to the AONB management plan secured. In other words, regard is given to the impact that a policy-compliant development could have.
18. Assessment of the GIS layers for AONB components is underpinned by consideration of information and guidance set out for instance in the Borough Landscape Character Assessment Objectives and Historic Landscape Characterisation Study. These, and other environmental sensitivities identified above, are all identified on the Council's GIS system, which has been used to screen proposed sites and developments.
19. Where a significant adverse impact is considered likely to occur, then it would make a development much more likely to be treated as 'major'. While a major impact does not necessarily correlate with a 'major' development, harm to the landscape and scenic beauty of the AONB would weigh heavily against the acceptability of a development irrespective of whether the proposal is 'major' or not.
20. The degree of impact will depend on the degree to which character components are affected. This can be a clearly significant impact if a highly sensitive component, such as Ancient Woodland, is directly affected or if an assemblage of components, such as medieval field pattern, historic farmstead, pond/woodland, would be compromised. A moderate impact can be where only few of the components are affected, while there would be little significant impact if there are only limited or indirect implications for the integrity of character components.
21. It is again considered helpful to view impact on AONB purposes on a scale:

<b>High impact</b>	Impacts on several AONB character components
<b>Moderate impact</b>	Impacts on some AONB character components
<b>Low impact</b>	Impacts on few if any AONB character components

Forming a conclusion:

22. The results of the respective assessments against each of the above NPPF considerations are drawn together by experienced planning officers in making a judgement on whether a development is major. While this is a matter of judgement, it is based on experience in the local context, while the above assessment framework provides a basis for ensuring consistency of approach with the NPPF, and to the treatment of sites in the Local Plan.
23. The consideration of AONB components in the table below is based upon the identified five components of *natural beauty* in the AONB Management Plan which are:
  - Geology, Landform and Water Systems
  - Settlement
  - Routeways
  - Woodland
  - Field and Heath

For each component there are objectives within the AONB Management Plan and this is supported by a set of spatial data relevant to the objectives. The relevant spatial data listed below (with a useful objective reference from the AONB Management Plan) has been screened against each site to help assess the potential degree of interaction between the allocation and the components of natural beauty. It should be noted that this screening:

- Only picks up components that are on or form part of the site boundary
- Identification of a component does not necessarily mean that there will be a direct or indirect impact on the component.
- The spatial data does not record the quality or condition of the component.

Any notable features relevant to AONB components not picked up by the spatial data but otherwise noted from other sources or observed by officers has also been noted.

### Geology, Landform and Water Systems

- G1 Reservoirs
- G1 Ponds
- G1 Openwater
- G1 Watercourses
- G2 Outcrops (Sandstone outcrops)
- G2 Geo (sandstone geology - this records underlying geology)

### Settlement

- S2 Settlements (Historic settlement)
- S2 Farmstead (Historic farmstead)

### Routeways

- R1 Roads (Historic Routeways that are now roads)
- R1 PROW (Historic routeways that are Public Rights of Way –PROW)

### Woodland

- W1 Ancient Woodland

### Field and Heath

- FH2 Historic Fields (where relevant additional information from the Historic Landscape Characterisation has been added)
- FH2 Heathland
- FH3 Meadows (Wildflower Meadows)



### Appendix 3: Assessment of AONB sites

SITE POLICY REFERENCE (call for sites and late site references and SALP <sup>23</sup> )	SITE ADDRESS	SETTLEMENT/ PARISH	NATURE / TYPE OF DEVELOPMENT	SCALE Very Substantial/ Substantial/ Mod. Substantial/ Not substantial	SETTING Poorly related/ Reasonably related/ Well related	IMPACT High/ Moderate/ Low	AONB component parts directly affected <sup>24</sup>	CONCLUSION
<b>Royal Tunbridge Wells</b>								
<b>RTW 12</b> – (57 and LS 43)	Land adjacent to Longfield Road	Main Urban Area	Allocated for Employment	Very Substantial 37ha	Reasonably related	High Impact	R1 PROW G1 Ponds G1 Watercours e, G2 Geo W2 Ancient Woodland FH2 Historic Fields,  HLC – late post medieval	<b>Major</b> Very large site on the edge of settlement close to ridge. Significant changes in topography expected  Historic field patterns altered by A21 works. Urban fringe issues, frequent temporary uses e.g. fairs. Ancient woodland can be retained and protected.  One of very few sites close to existing industrial area of RTW that can provide the required economic land and meets the requirements of one of the largest employers in RTW.

<sup>23</sup> SALP – Site previously included in Site Allocations Local Plan 2016

<sup>24</sup> This relates to the

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<b>RTW 13 – (101)</b>	Land at Colebrook House, Pembury Road	Main Urban Area	Allocated for Employment	Very Substantial 7.71ha	Reasonably related (proposed development relates to existing parkland character)	Moderate Impact	G1 Ponds G2 Geo W2 Ancient Woodland  Late 19C parkland  PROW nearby	<b>Major</b> Potentially large scale development in sensitive landscape. Localised risk to landscape character.  Site setting altered by recent A21 improvements works. Heritage assets can be protected and retained and development can be integrated with landscape character and appropriate landscape management secured.  Limited opportunities for heritage assets which may benefit from enabling development. Rare opportunity in Borough for heritage led economic use.
<b>RTW 18 – (137)</b>	Land to the west of Eridge Road at Spratsbrook	Main Urban Area	Allocated for 270 dwellings and school	Very substantial	Reasonably related	High Impact	R1 Road G2 Geo  Also	<b>Major</b> Large scale development in sensitive landscape. Heritage assets and topography likely to be affected.

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	Farm		0.97%				nearby/adjacent R1 PROW G1 Ponds G2 Outcrops W2 Ancient woodland S2 Farmstead FH2 Historic Fields – HLC medieval assart.	Site exhibits some urban fringe issues and poor edge of settlement. Strong landscape structure of containment. Ancient woodland can be protected and enhanced and structural landscape can be reinforced to provide strong edge of settlement. Good connectivity to town and wider landscape.  The only site that has come forward that is suitable to deliver a new secondary school in this part of the Borough.
<b>RTW 23 – (53)</b>	Land to the north of Hawkenbury Recreation Ground	Main Urban Area	Recreation	Substantial 7.1ha	Reasonably related	Moderate Impact	R1 PROW/ Road G1 watercourse G2 Geo W2 Ancient woodland  FH2 Historic Fields –	<b>Not Major</b> Although the policy does allow for built elements the primary use is recreational and the site is strongly associated with existing recreational uses and well defined site boundaries.  Hedgerows and woodland will be retained and protected.

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							HLC Assart overlaid by 20C changes.	
<b>Southborough</b>								
<b>SO 3 – (445)</b>	Land at Mabledon and Nightingale	Southborough Parish	Residential 50-120	Very substantial	Poorly related	High Impact	R1 PROW R1 Roads G1 Water Courses G1 Ponds G2 Geo FH2 Historic Field FH3 Heathland S2 Farmsteads S2 Settlements W2 Ancient Woodland HLC – mix	<b>Major</b> Potential to be a large scale development in a sensitive rural landscape.  Very restrictive policy requiring positive landscape outcomes. Site located close to main road between two major settlements with options for walking/cycling routes.  Unique circumstances of location, settlement type and land ownership and a very restrictive and particular policy that could offer substantial AONB benefits and provide a learning

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							of medieval and modern fields.	opportunity to guide future plan led development in the High Weald.
<b>SO 4 – (90+)</b>	Mabledon Hotel & Conference Centre Proposal	Southborough Parish	Hotel Allocation	Moderately substantial (Re-development and enabling development centred on heritage assets)	Reasonably related	Low/ Moderate Impact	G1 Water Courses G1 Ponds G2 Geo W2 Ancient Woodland  Historic Park and Garden with listed buildings and quarry.	<b>Not Major</b> Development is likely to focus on existing buildings and also likely to result in improvements to existing heritage assets.  Both listed landscape and building are potentially at risk and would benefit from new investment. Appropriate landscape management can be secured through any consent.
<b>Cranbrook and Sissinghurst</b>								
<b>CRS 1 – (125)</b>	Land adjoining Wilsley Farm, adjacent to Angley Road	Cranbrook	Residential: 15-20 dwellings	Not substantial	Reasonably well related	Low	G2 Geo FH2 Historic	<b>Not Major.</b> Relatively small site on main road likely to be viewed as infill development.

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	and Whitewell Lane						Field  HLC Modern field amalgamation.	Structural landscape can be improved.
<b>CRS 2 – (129)</b>	Big Side Playing Field, adjacent to Quaker Lane and Waterloo Road	Cranbrook	Residential: 10-15 dwellings	Not substantial	Reasonably well related	Low Impact	R1 Road G2 Geo S1 Settlement FH2 Historic Field  HLC - Field is early 20C	<b>Not Major.</b> Small site on edge of very large playing field.  Development can be designed to respect settlement pattern.
<b>CRS 3 – (131)</b>	Jaegers Field, Angley Road	Cranbrook	Residential: 30-35 dwellings	Not substantial 1.98%	Well related	Low	G2 Geo S2 Settlements FH2 Historic Field  HLC 20C field pattern	<b>Not Major.</b> Relatively small and well contained site on edge of playing field.  Woodland and boundary features to be retained and protected. Landscape structure can be improved.

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<b>CRS 4 – (430)</b>	Turnden Farm, Hartley Road	Cranbrook	Residential: 160-170 dwellings	Very substantial (as more than 100 dwellings) 9.62%	Reasonably well related	Moderate/ High	R1 Road and PROW G1 Water Courses G1 Ponds G2 Geo S2 Farmsteads S2 Settlements W2 Ancient Woodland FH2 Historic Field  HLC - early post medieval, 20C and 21C	<b>Major</b> Location between Cranbrook and Hartley makes size a more significant factor. In a sensitive area between Cranbrook and Hartley will require careful consideration to avoid coalescence and to respect heritage assets.  Only that part of the site closest to existing development at Cranbrook to be developed. Land between Hartley and proposed development to be retained as open space/agriculture. Structural landscape features to be retained and enhanced with historic tree lines and hedgerows restored. Improvements to existing water course and ancient woodland protected. Potential to extend Crane valley LNR/green infrastructure.  Historical equestrian use and

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								recent development has left the land with no clear function and is not being actively put to agriculture. Development provides an opportunity to resolve land use issues and to provide a green and permanent gap between Hartley and Cranbrook that builds on and relates well to other recent development.
<b>CRS 5</b> – (71, 33)	Land adjoining Cranbrook Primary School, Quaker Lane	Cranbrook	Residential: 35-45 dwellings	Not substantial 2.55%	Well related	Moderate Impact	R1 PROW G1 Ponds G2 Geo S2 Settlements FH2 Historic Fields  Partly early post medieval field system isolated by modern developme	<b>Not Major.</b> Site relatively well enclosed with urban fringe issues.  Most AONB features and boundaries will be retained and green space formalised with appropriate management secured.



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							nt.	
<b>CRS 6</b> – (59, 70, 323, 345, LS53)	Gate Farm, adj Hartley Road and Glassenbury Road	Hartley	Residential: 90 dwellings	Very substantial 42.45%	Reasonably well located	High Impact	G1 Ponds G2 Geo S2 Farmstead S2 Settlement FH2 Historic Fields  HLC small part post medieval, assart adjacent but most modern. Grouping of historic farmsteads – now much altered at historic road	<b>Major</b> This is a relatively large development dispersed over two sites that has the potential to radically change the character of this farmstead grouping. Heritage assets will need careful consideration.  Some detracting elements and poor landscape management can be addressed through development. Existing site context and careful design can result in a discrete well contained development.  Builds on existing dispersed settlement pattern and includes a redundant site and some poor quality development.

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							junction.	
<b>CRS 7 – (LS 32)</b>	Land off Golford Road	Cranbrook	Residential: 150 Dwellings	Very Substantial as more than 100 dwellings 8.49%	Reasonably well related	Moderate	G2 Geo, FH2 Historic Fields  HLC Field pattern 20C	<b>Major</b> Location and rural context makes size a more significant factor.  Strong landscape framework so that development may be visually well contained and landscape boundaries can be protected and enhanced.  Has good connections to town and wider countryside
<b>CRS 8 – (271)</b>	Former Cranbrook Engineering Site and Wilkes Field	Cranbrook	Residential: 28 dwellings	Not substantial	Well related	Low	R1 PROW S2 Settlements	<b>Extant permission so not assessed</b>
<b>CRS 9 – (SALP)</b>	Land adjacent to the Crane Valley	Cranbrook	Residential: 200-250 dwellings	Very substantial	Well related	High	Assessed under SALP	<b>Extant permission so not assessed</b>
<b>CRS 10 - (128,130)</b>	Cranbrook School  NO SPECIFIC	Cranbrook	Policy recognises potential for wider site to	Unknown	Well related	Unknown	R1 PROW G1 Ponds G1 Water Courses	<b>No assessment required at this stage.</b>

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	ALLOCATION		deliver educational & community facilities. Requirement for an overall masterplan approach to preclude sporadic development within wider landholding				G2 Geo S2 Settlements	
<b>Hawkhurst</b>								
<b>HA 1 – (115)</b>	Land forming part of the Hawkhurst Golf Course to the north of the High Street	Hawkhurst Highgate	Residential: 400-450 dwellings	Very substantial 25.82%	Reasonably related	High	G1 Water Courses G1 Ponds G2 Geo S2 Historic Settlements  W2 Ancient	<b>Major</b> Extensive site area and large amount of development requiring considerable topographical and landscape changes.  Land substantially modified to form golf course such that

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							woodland adjacent.  Assart fields adjacent but site fields 21C.	development could restore and improve landscape features. Water course and adjacent ancient woodland to be protected and enhanced.  Development is conditional on provision of bypass to improve traffic in village centre.
<b>HA 2 – (361)</b>	Land at The White House, Highgate Hill	Hawkhurst Highgate	Residential: 10-12 dwellings	Not substantial 0.69%	Well related	Low	G2 Geo S2 Settlement FH2 Historic Fields	<b>Not Major</b> Land is predominantly built development and residential garden
<b>HA 3 – (432)</b>	Land to the east of Heartenoak	Hawkhurst Highgate	Residential: 28 dwellings	Not substantial 1.61%	Well related	Moderate	G2 Geo S2 Settlement FH2 Historic Fields  HLC – consolidated medieval field W2	<b>Extant permission so not assessed</b>

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							Ancient woodland adjacent but not affected.	
HA 4 – (413)	Land at Fowlers Park	Hawkhurst Highgate	Residential: 100 dwellings	Moderately substantial 5.74%	Reasonably related	Moderate	G2 Geo S2 Settlement W2 Ancient woodland  FH2 Historic Fields – HLC late post medieval parkland.	<b>Major</b> Large scale development with strong rural context and notable landscape features including topography.  The existing edge of settlement poorly detailed in this area and whilst some AONB components are affected large parts retained for buffering and landscape protection.  Should result in strong edge of settlement, provision of community facilities and school expansion. Landscape features and ancient woodland to be secured into appropriate management. Previously assessed as having potential for development.

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<b>HA 5 – (SALP)</b>	Brook House, Cranbrook Road	Hawkhurst Highgate	Residential: 25 dwellings	Not substantial 1.43%	Well related	Low	Allocated site	<b>Extant permission so not assessed</b>
<b>HA 6 – (78, 419)</b>	Land at Copthall Avenue and Highgate Hill	Hawkhurst Highgate	Residential 70-79 dwellings	Not Substantial 4.53%	Reasonably related	Moderate	G1 water Course G1 Ponds G2 Geo S2 Settlement  FH2 Historic fields - HLC early post medieval and Early 20C  PROW adjacent	<b>Major</b> Location in the valley between Highgate and the Moor is a determining factor as are the presence of sensitive features.  Development should result in improvements to existing poor edge of settlement and improved connectivity to rural landscape.  Development has the potential to be well integrated with existing settlement and to demonstrate a landscape led approach with appropriate AONB design response, green space provision, landscape protection and enhancements.
<b>HA 7 - (SALP)</b>	Site at Sports Pavillion, King	Hawkhurst The Moor	Redevelopm ent for	Not Substantial -	Reasonably related	Low	Possibly part of the	<b>Not Major</b> No significant changes to

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	George V Playing Fields, The Moor		community and Recreation	No change in overall area			original Moor but became a recreation ground post WWII. AONB Component s unlikely to be affected.	character of area or landscape features.
HA 8 – (102)	Hawkhurst Station Business Park	Hawkhurst Gills Green	Allocation for employment uses	Very Substantial About 2ha of additional land but significant increase over existing site. Note: adjacent to HA 9 so consideration of cumulative effect required.	Reasonably related	Moderate Impact	G2 Geo  HLC Part of cohesive assart field although field sub divided in modern times and some history of industrial use.	Individual site <b>Not Major</b> but taken together with HA9 <b>Major</b> Together with HA 9 would bring about a significant change in character and consolidate development around Gills Green.  Taken alone will be seen in the context of the existing employment site as a natural extension onto land previously used in association with the railway yard and related economic development. Site is well

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								contained and existing strong boundaries will be retained and protected.  Natural extension of existing employment land. Other opportunities for such provision are extremely limited.
HA 9 – (422)	Land at SanTERS Yard, Gill's Green Farm	Hawkhurst Gills Green	Residential: 38 units and employment uses	Very Substantial Additional 1ha of employment and a significant increase in number of dwellings for the settlement. Note: adjacent to HA 8 so consideration of cumulative effect required.	Reasonably related	Moderate Impact	G2 Geo  HLC Part of cohesive assart field although field sub divided in modern times and some history of industrial use. Listed farm to east.	Individual site <b>Not Major</b> but taken together with H8 <b>Major</b> Employment cannot come forward without H8 and together these two sites represent a significant increase in the scale and extent of employment land and consolidate development around Gills Green.  The residential element on its own is likely to be considered <b>Not Major</b> and could come forward separately. Both sites are well contained and existing strong boundaries will be retained and protected.



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								Natural extension of existing employment land. Other opportunities for such provision are extremely limited. Housing element is strongly associated with existing residential area and includes redundant yard and structures to be removed.
<b>HA 10 – (55)</b>	Site at Limes Grove	Hawkhurst Gills Green	Safeguarded for employment use	Moderately substantial 0.55ha	Well related	Low	G2 Geo  20th century field close to historic farmstead	<b>Not Major</b> A small more discrete and well contained site
<b>Benenden</b>								
<b>BE 1 – (35)</b>	Land at Walkhurst Road	Benenden	Residential: 12 dwellings	Not substantial 3.75%	Well related	Low	FH2 Historic Field  HLC late 20C Large landscape	<b>Extant permission so not assessed</b>

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							gardens	
<b>BE 2 – (LS16)</b>	Land adjacent to New Pond Road	Benenden	Residential: 23-25 dwellings	Moderately substantial 7.81%	Well related	Low	S1 Settlement	<b>Not major.</b> Site well related to village and development not particularly large. Also, low impact on AONB components.
<b>BE 3 – (277)</b>	Feoffee Cottages and land, Walkhurst Road	Benenden	Residential: 25-30 dwellings	Moderately substantial 9.38%	Well related	Moderate	S1 Settlement S1 Farmstead FH2 Historic Field  HLC Early post medieval field pattern adjacent to ancient woodland and historic farmstead.	<b>Not major.</b> Site well related to village and development not particularly large, albeit some impact on AONB components but large buffer to ancient woodland.
<b>BE 4 – (424, LS41)</b>	Land at Benenden	Benenden East end	Residential:	N/A	N/A	N/A	HLC 20C	<b>Not assessed as outside AONB.</b>

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	Hospital  NOT LOCATED WITHIN AONB but is immediately adjacent so raises setting concerns		64-74 dwellings				fields	Mostly previously developed. Issue of setting of the AONB considered elsewhere.
<b>Brenchley and Matfield</b>								
<b>BM 1 – (LS27)</b>	Land between Brenchley Road, Coppers Lane, and Maidstone Road	Matfield	Residential: 30-45 dwellings	Very substantial 19.4%	Reasonably related	Moderate	G2 Geo S1 Settlements S1 Farmstead, FH2 Historic Fields  HLC Modern Field amalgamation	<b>Major:</b> Will be perceived as large development owing to context. Will alter settlement pattern. Most hedgerows to be retained and enhanced.  Well located in relation to village centre. Isolated agricultural field. Landscape structure and biodiversity can be improved.  Application of strong policy can provide modest development in sustainable location whilst retaining

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								sense of place and views.
<b>BM 2 – (18)</b>	Matfield House orchards and land	Matfield	Residential: 20-30 dwellings	Substantia 12.93%l	Well related	Moderate	G2 Geo S2 Settlements  HLC early modern and late 20C field.	<b>Not Major:</b> Only eastern part of allocation to include built development. Significant landscape AONB features retained with scope for improvements.
<b>BM 3 – (353)</b>	Ashes Plantation, Maidstone Road	Matfield	Residential: 30-60 dwellings	Very substantial 25.86%	Well related	Low	G2 Geo S2 Settlements W2 Ancient Woodland  HLC late 20C field pattern.	<b>Not Major:</b> Ancient woodland off site and buffered. No field boundaries altered.
<b>BM 4 – (401)</b>	Land at Maidstone Road	Matfield	Allocation for 11-15 dwellings and car park	Moderately substantial 6.47%	Well related	Low	G2 Geo S2 Settlements  HLC late 20C	<b>Not Major:</b> Site well related to village and community facilities. Landscape much altered with no clear structure.
<b>Goudhurst</b>								
<b>GO 1 – (124)</b>	Land east of Balcombes Hill and adjacent to Tiddymotts	Goudhurst	Residential: 10-15 dwellings	Not substantial 2.71%	Well related	Low	G1 Ponds G2 Geo S2 Settlement	<b>Not Major</b> Well related to development. Mostly former garden area.

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	Lane							
<b>GO 2 – (174)</b>	Land at Triggs Farm, Cranbrook Road	Goudhurst	Residential: 11 dwellings	Not substantial 1.99%	Reasonably well related	Low	G2 Sandstone S2 Historic Settlement FH2 Historic fields - HLC Early Post medieval field	<b>Extant permission so not assessed</b>
<b>Lamberhurst</b>								
<b>LA 1 – (279)</b>	Land to the west of Spray Hill	Lamberhurst	Safeguarded for school and 25-30 dwellings	Moderately substantial 6.86%	Reasonably related	Moderate	R1 PROW G2 Geo S2 Historic Settlement 20C field patterns	<b>Not major</b> Relatively small area to be developed for housing some of which is previously developed and is visually well contained..
<b>LA 2 – (285)</b>	Misty Meadow, Furnace Lane	Lamberhurst	Residential: 25-30 dwellings	Moderately substantial 6.86%	Reasonably related	Moderate	R1 PROW G1 Ponds G2 Geo S2 Settlement W2 Ancient woodland FH2 Historic	<b>Not major</b> Development only on limited part of site with scope for significant landscape improvements. Field pattern disrupted by modern farm and garden expansion.

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							Fields HLC early post medieval	
<b>Pembury</b>								
<b>PE 1</b> – (44, 67, 368,369, LS5)	Land to the rear of High Street and west of Chalket Lane	Pembury	Residential: 70-80 dwellings	Not substantial 3.35% Note: adjacent to PE2 & 3 so consideration of cumulative effect required. (cumulative 10.89)	Well related	Low	G2 Geo FH2 Historic Fields HLC Medieval field affected by A21 – some 20C	<b>Not Major</b> on its own but cumulative with PE2 and PE3 <b>Major</b> Linear parcel of land might be perceived as a buffer to A21 and provides a green edge to this part of Pembury.  Strip of land left over after construction of A21 in sustainable location. Limited contribution to wider AONB landscape. Opportunity to strengthen wooded buffer to A21.  Issues around cumulative effects can be addressed through design. Offers opportunity for sustainable development whilst retaining green edge to Pembury.
<b>PE 2</b> – (50,	Land at	Pembury	Residential:	Not	Well related	Low	R1 PROW	<b>Not Major</b> on its own but

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390)	Hubbles Farm and south of Hastings Road		90 dwellings	substantial 3.77% Note: adjacent to PE1 & 3 so consideration of cumulative effect required. (cumulative 10.89)			G2 Geo FH2 Historic Fields – HLC Early post medieval field affected by A21.	cumulative with PE1 and PE3 <b>Major</b> Linear parcel of land might be perceived as a buffer to A21 and provides a green edge to this part of Pembury.  Strip of land left over after construction of A21 in sustainable location. Limited contribution to wider AONB landscape. Opportunity to strengthen wooded buffer to A21.  Issues around cumulative effects can be addressed through design. Offers opportunity for sustainable development whilst retaining green edge to Pembury.
PE 3 – (189)	Land north of the A21, south and west of Hastings Road	Pembury	Residential: 90 dwellings	Not substantial 3.77% Note: adjacent to PE 1 & 2 so consideration of cumulative	Well related	Low	R1 PROW G2 Geo W2 Ancient woodland FH2 Historic Fields – early post	<b>Not Major</b> on its own but cumulative with PE1 and PE2 <b>Major</b> Linear parcel of land might be perceived as a buffer to A21 and provides a green edge to this part of Pembury.

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				effect required. (cumulative 10.89)			medieval cut through by A21.	Strip of land left over after construction of A21 in sustainable location. Limited contribution to wider AONB landscape. Opportunity to strengthen wooded buffer to A21.  Issues around cumulative effects can be addressed through design. Offers opportunity for sustainable development whilst retaining green edge to Pembury.
<b>PE 4 – (375)</b>	Land at Dowdingbury Farm, Maidstone Road	Pembury	Safeguarded for Hospice and 25 dwellings	Not substantial 1.05%	Reasonably related	Low	R1 PROW G2 Geo S2 Farmstead W2 Ancient Woodland adjacent. HLC Fields 20C	<b>Not Major</b> Limited development proposed and area already affected by modern development including bypass.
<b>PE 5</b>	Land at Henwood Green Road	Pembury	Residential: 19 dwellings	N/A	N/A	N/A	Previously developed land	<b>Extant permission so not assessed</b>
<b>PE 6 – (444, LS 13, 136)</b>	Land at Tunbridge Wells Hospital	Pembury	Key Medical facility	Very Substantial	Poorly related	High	R1 PROW G2 Geo S2 Farmstead	<b>Major</b> Sensitive site in rural location. Development could



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	and adjacent to Tonbridge Road						W2 Ancient Woodland FH2 Fields 20C	<p>potentially be very significant in scale and massing. Nature of development might make mitigation through design difficult.</p> <p>Important landscape features and including ancient woodland can be protected. Opportunities to protect and restore landscape features where they have been poorly managed.</p> <p>The site of the district general hospital is severely constrained and allocation provides the opportunity to make provision for future health related requirements that can benefit from close proximity of complimentary facilities.</p>
PE 7 – (395)	Woodsgate Corner	Pembury	Allocated for Employment	Not Substantial (largely previously developed/	Well related	Low	R1 Roads G2 Geo	<p><b>Not Major</b></p> <p>Existing allocation with extant permission. Assessment based on changes as a result likely effects of new policy which in AONB and</p>

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				extant consent.				contextual terms are not considered significant.
<b>Sandhurst</b>								
<b>SA 1</b> – (149, 227)	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane	Sandhurst	Residential: 10-15 dwellings	Not substantial 3.7%	Well Related	Low	R1 PROW G2 Geo FH2 Historic Field HLC early post medieval (compromised by modern development)	<b>Not Major</b> Site is small and well related
<b>SA 2</b> – (147)	Land adjacent to Old Orchard and Stream Pit Lane	Sandhurst	Residential: 10-12 dwellings	Not substantial 2.96%	Well related	Low	G2 Geo	<b>Not Major</b> Site is small and well related and is a further phase of previous development for a wider land parcel.
<b>Speldhurst</b>								
<b>SP1</b> – (231)	Land to the west of Speldhurst	Speldhurst	Residential: 15-20	Not substantial	Reasonably related	Low	S2 Settlement G2 Geo	<b>Not Major</b> Relatively small development that is well related and

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	Road and south of Ferbies		dwellings	4.95%			FH2 Historic Field – HLC early post medieval – remnant of land associated with 20C development to the north.	contained by a strong landscape framework.
<b>SP 2 – (416)</b>	Land north of Langton House	Langton Green	Safeguarded for school expansion	N/A	Well related	Low	R1 PROW G2 Geo G2 outcrop FH2 Historic Field HLC early post medieval	<b>Not Major</b> Land safeguarded for future development potential including sports pitches.
<b>SP 3 – (239)</b>	Land adjacent to Rusthall recreation ground	Langton Green	Safeguarded for recreation	N/A	Well related	Low	G2 Geo FH2 Historic Field – HLC early post medieval	<b>Not Major</b> Land safeguarded for future development potential including sports pitches.

## Appendix 4: Typical Services by Settlement Population Size

1. In order to ascertain the approximate population of the proposed new Village at Tudeley once it has full been developed (including beyond the Plan period), it is important to obtain the necessary Census Data (ONS, 2011) to make an accurate estimation. Consequently, based on data from the 2011 Census, the borough of Tunbridge Wells had a population of 115,049 within 47,174 households. By using the number of households as the base figure for number of individual dwellings, it is calculated that there is an average of approximately 2.5 people within every household/dwelling across the borough. Multiplying this figure by the 2,500-2,800 dwellings proposed at Tudeley Village, it can reasonably be expected that the development post-completion would have an approximate population of 6,250-7,000.
2. Based on the findings set out in the table below, it can be predicted that Tudeley Village will have a similar population size to both that of Pembury (6,128) and Cranbrook and Sissinghurst (6,717).
3. It can therefore be expected that the services provided in settlements of 4,501 – 6,000 population ( Hawkhurst (4,911), Rusthall (4,976), Speldhurst and Langton Green (4,978)) would represent the minimum level of services that would be expected in Tudeley village, and potentially similar to the those at Pembury and Cranbrook and Sissinghurst, as based on the range of services found in both of these settlements based on the Role and Function Study<sup>25</sup> and further work carried out as part of preparing the new Local Plan.
4. There would be an expectation that the proposed development at Tudeley Village would initially be developed alongside the provision of a range of these services, such as recreational, education, and healthcare facilities as part of the masterplanning approach and prior agreements with Kent County Council (KCC) and the Clinical Commissioning Group (CCG), with a recognition that the early provision of other services such as retail provision is very important in place shaping, and forming of communities.

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<sup>25</sup> Tunbridge Wells Borough: Settlement Role and Function Study (February 2017); [https://beta.tunbridgewells.gov.uk/\\_data/assets/pdf\\_file/0005/291731/Settlement-Role-and-Function-Study\\_Feb-2017.compressed.pdf](https://beta.tunbridgewells.gov.uk/_data/assets/pdf_file/0005/291731/Settlement-Role-and-Function-Study_Feb-2017.compressed.pdf)

Population Size of Settlement	Name of Settlement (Population Figures Obtained from 2011 Census Data, ONS)	Range of Services (Role and Function Study, 2017; <i>Please note that these ranges are estimates likely to have changed; Please refer to Role and Function Study for individual settlement services</i> )
0 – 1,750	<ul style="list-style-type: none"> <li>• Frittenden (888);</li> <li>• Bidborough (1,163);</li> <li>• Sandhurst (1,478);</li> <li>• Lamberhurst (1,706)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (2);</li> <li>• Health Facilities (0-1);</li> <li>• Retail Services (1-5);</li> <li>• Pubs (1);</li> <li>• Village Halls (1);</li> <li>• Churches (1-2);</li> <li>• Recreational Facilities (2-4);</li> <li>• Allotments (yes)</li> </ul>
1,751 – 3,000	<ul style="list-style-type: none"> <li>• Benenden and Iden Green (2,374);</li> <li>• Horsmonden (2,435);</li> <li>• Five Oak Green (2,467);</li> <li>• Brenchley and Matfield (2,863)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (1-4);</li> <li>• Health Facilities (0-2);</li> <li>• Retail Services (2-6);</li> <li>• Pubs (1-3);</li> <li>• Village Halls (3-4);</li> <li>• Churches (3-4);</li> <li>• Recreational Facilities (3);</li> <li>• Allotments (yes)</li> </ul>
3,001 – 4,500	<ul style="list-style-type: none"> <li>• Goudhurst and Kilndown (3,327);</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (3);</li> <li>• Health Facilities (2);</li> <li>• Retail Services (14);</li> <li>• Pubs (5);</li> <li>• Village Halls (3);</li> <li>• Churches (3);</li> <li>• Recreational Facilities (5);</li> <li>• Allotments (no)</li> </ul>

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4,501 – 6,000	<ul style="list-style-type: none"> <li>• Hawkhurst (4,911);</li> <li>• Rusthall (4,976);</li> <li>• Speldhurst and Langton Green (4,978)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (2-4);</li> <li>• Health Facilities (2-6);</li> <li>• Retail Services (14-49);</li> <li>• Pubs (2-3);</li> <li>• Village Halls (2-4);</li> <li>• Churches (2-3);</li> <li>• Recreational Facilities (4-7);</li> <li>• Allotments (yes)</li> </ul>
6,001 - 7,000	<ul style="list-style-type: none"> <li>• Pembury (6,128);</li> <li>• Cranbrook and Sissinghurst (6,717)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (4-6);</li> <li>• Health Facilities (4-12);</li> <li>• Retail Services (22-100+);</li> <li>• Pubs (3);</li> <li>• Village Halls (1-3);</li> <li>• Churches (3-6);</li> <li>• Recreational Facilities (3-17);</li> <li>• Allotments (yes)</li> </ul>
7,001 – 10,000	<ul style="list-style-type: none"> <li>• Paddock Wood (8,253)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (4);</li> <li>• Health Facilities (7);</li> <li>• Retail Services (82);</li> <li>• Pubs (2);</li> <li>• Village Halls (2+);</li> <li>• Churches (5);</li> <li>• Recreational Facilities (13);</li> <li>• Allotments (yes)</li> </ul>
10,001 - 20,000	<ul style="list-style-type: none"> <li>• Southborough (12,459)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (7+);</li> <li>• Health Facilities (5);</li> <li>• Retail Services (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Pubs (3);</li> </ul>

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		<ul style="list-style-type: none"> <li>• Village Halls (3);</li> <li>• Churches (8);</li> <li>• Recreational Facilities (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Allotments (yes);</li> </ul>
20,001 - 50,000	<ul style="list-style-type: none"> <li>• Royal Tunbridge Wells (48,324)</li> </ul>	<ul style="list-style-type: none"> <li>• Education Facilities (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Health Facilities (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Retail Services (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Pubs (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Village Halls (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Churches (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Recreational Facilities (<i>Several/Unspecified as not in Role and Function Study</i>);</li> <li>• Allotments (yes)</li> </ul>

**If you require this document in another format, please contact:**

**Planning Policy Planning Services  
Tunbridge Wells Borough Council Town  
Hall Royal Tunbridge Wells Kent TN1 1RS**

**Tel: 01892 554056**

**Email: [localplan@tunbridgewells.gov.uk](mailto:localplan@tunbridgewells.gov.uk)**