

AONB and the ENVIRONMENT

If you are concerned about the effect of development on the AONB and the environment you may wish to comment on:

What the Plan says

[P28, Section 2, 2.32 \(Comment Box 1A and 1B\)](#)

Given the environmental constraints within the borough, it is important that new development makes the most efficient use of land, while also ensuring that development is of a high quality, in sustainable locations, and does not have an unacceptable adverse impact on the character and setting of the natural and built environment of the borough.

[Section 4, P34 4.7 \(Comment Box 1A and 1B\)](#)

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 methodology as required by the NPPF(20)

Notes

- 62% of the Civil Parish is AONB which lies in the southern half of the parish only.
- **ALL** Cranbrook's TWBC site allocations lie within the AONB including several large allocations
- Comment from a local: **'Tunbridge Wells Borough Council does not need to accept the levels of housing proposed by the Government.'** 70% of the borough is protected as an Area of Outstanding Natural Beauty (AONB) and national policy allows for development to be reduced where valued landscapes can be damaged (NPPF, Paragraph 11).
- ***Why hasn't Tunbridge Wells assessed the harm that cumulative development can do to the AONB landscape and its communities, and argued for lower housing numbers as a result?***

What the Plan says

[Section 3, P30 Vision and Objectives 2- Strategic Objective 6. \(Comment Box 2A and 2B\)](#)

To protect the valued heritage, and built and natural environments of the borough, including the AONB and to achieve net gains for nature.

Notes

- Local research for the NDP has indicated that Parish residents are against large scale development and the Wealden Landscape habitation pattern did in fact evolve from small 'farmstead' developments.

What the Plan says

[P34, Section 4 - 4.7 \(Comment Box 1A and 1B\)](#) 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 methodology** as required by the NPPF(20)

[P199, Section 5 - STR/CRS1 \(Comment Box 2A and 2B\)](#)

Approximately 718-803 new dwellings will be delivered on 9 sites.

- The Parish Council has assessed Cranbrook and Sissinghurst's housing need, which is a lower figure than Tunbridge Wells has chosen, and the need is for truly affordable dwellings.
- The Parish Council has also assessed the suitability of sites for development in some detail demonstrating that some sites allocated by Tunbridge Wells are unsuitable and unsustainable, but this information appears to have been ignored by Tunbridge Wells Borough Council.
- ***Why has Tunbridge Wells not limited housing development in AONB communities to the numbers that meet local need and insisted that homes are truly affordable?***
- ***Why has Tunbridge Wells ignored the Parish Council's advice on site allocations?***

- We know we need to build houses and have used an independent provider of professional support services, to arrive at a figure for housing in the Parish which is a bit less and can be delivered by small scale housing developments

What the Plan says

[P30, Section 2 - 2.44 \(Comment Box 1A and 1B\)](#)

The cumulative impact of minor piecemeal development and small changes in land use can have a significant overall adverse impact on the natural, built, and historic environment, and on the character and settlement pattern within, and adjacent to, the High Weald AONB.

[P57 Section 4 - 4.69 \(Comment Box 1A and 1B\)](#)

The south and south east of the borough contain typical Wealden settlements, which are intimate, small scale and formed of dens and hursts, characteristic of the AONB's components of natural beauty. Cranbrook, historically the centre of the wool trade in the borough, is the central settlement in this area.

[P57 Section 4 - 4.70 \(Comment Box 1A and 1B\)](#)

Planning policies within this Draft Local Plan should contribute to, and enhance, the natural, built, and historic environment of the borough in accordance with the guidance set out within the NPPF. Policy should seek to ensure that the delivery of new development is balanced against the need to conserve and enhance the character and distinctiveness of the borough's natural and built environment, in terms of the intrinsic character and diversity of the landscape, its biodiversity, and heritage assets. Furthermore, the historic environment is intertwined with the evolution of the landscape, in terms of the rural setting of both assets and settlements, and as a determinant of the historic pattern of economic and agricultural activities and uses.

Notes

- Even if exceptional circumstances are proved and housing numbers are increased in the AONB beyond local need, these should not be delivered through major development. All allocations made should be small-scale reflecting the small-scale character of the High Weald AONB, which was created by people, by hand and is one of the best-preserved medieval landscapes in North West Europe.
- ***Why has Tunbridge Wells allocated major development sites in the AONB - such as AL/CRS9 Brick Kiln Farm/Corn Hall (200-250) and AL/ CRS4 Turnden Farm(160 - 170), AL/CRS6 Hartley (90) and AL/CRS7 Land off Golford Road (150) and ignored its own policy set out in the draft Local Plan, its AONB Management Plan and the draft Parish Neighbourhood Plan to focus development on small-scale sites?***

What the Plan Says

[P39, Section 4 - 4.38 \(Comment Box 1A and 1B\)](#)

Taking into account the above planning and community considerations, the Council proposes a development strategy to meet the housing growth needs of the borough based on Option 3 (dispersed growth). This Draft Local Plan includes site allocations for housing growth that are located at the majority of settlements across the borough. In addition to this, the Development Strategy includes Option 5 (in terms of a new 'stand alone' garden settlement and the transformational expansion of an existing settlement, using garden settlement principles). **This also takes account of the need to maximise the amount of major development outside the High Weald AONB**

[P39, Section 4 - 4.40 \(Comment Box 1A and 1B\)](#)

Sustainable development of an appropriate scale at the smaller settlements to provide opportunities at the local level to meet housing needs and sustain local services and infrastructure, as well as the support for new local facilities where required, and at all times being aware that such development is taking place on valued and (in many cases) protected landscapes.

[P57, Section 4 - 4.67 \(Comment Box 1A and 1B\)](#)

The built and natural environments of the borough are rich in designated and non-designated heritage assets, landscape value, and biodiversity, which combine to create a distinctive local character recognised by residents and visitors alike. The High Weald AONB covers approximately 70% of the borough and, in addition to this, there are a number of locally recognised assets, designated sites, and habitats, including Ancient Woodland, veteran trees, and

Local Green Spaces, as well as Areas of Landscape Importance, Arcadian Areas, and Landscape Approaches. Together, they provide important visual amenity value and contribute to local character.

P58, Policy STR8 1. (Comment Box 2A and 2B) The urban and rural landscapes of the borough, including the designated High Weald AONB, will be conserved and enhanced;

The above statement is entirely negated by

STR8 5. (Comment Box 2A and 2B) Within the area designated as AONB and its setting, development will be managed in a way that conserves and enhances the natural beauty of the area, and developers will be expected to demonstrate (through relevant documentation submitted as part of a planning application) how proposals have had regard to the objectives of the High Weald AONB Management Plan. Proposals that would harm the natural beauty of the AONB will not be permitted unless it is clearly in the public interest to do so. In such instances, effective mitigation should form an integral part of the development proposals;