



CGPS Response to the Examiner's MIQ (Stage 2)

HEARING STATEMENT – MATTER 4 – PRINCIPLE OF GREEN BELT RELEASE

Issue 1 – Principle of Green Belt Release

Q3. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, paragraph 141 of the Framework states that strategic policy-making authorities should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for housing. This will be assessed through the examination and will consider whether the strategy:

- Makes as much use as possible of suitable brownfield sites and underutilised land;

TWBC have made little effort to investigate fully all brownfield sites available to them.

- Optimises the density of development, and

The priority is to provide affordable housing, but the plans appear to concentrate on larger, upmarket, homes that will be used by commuters to London and Tonbridge leading to a low density.

- Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need.

Discussions between West Kent LPAs have resulted in a lack of co-operation. The neighbouring Borough (TMBC) is strongly against the allocations in Capel.

How has the preparation of the Plan sought to make as much use as possible of suitable brownfield sites and optimise the density of development? **Clearly not.**

Q4. Can housing needs be met by optimising the use of previously developed land and buildings without requiring land to be released from the Green Belt? **Yes, we believe a lot of dwellings could be built on the available brownfield sites.**

Q5. Not all of Tunbridge Wells is within the Green Belt. Could the need for new housing and employment therefore be met by developing beyond the existing Green Belt boundary? If not, why not?

There is plenty of land in TWBC outside the Green Belt (and outside the AONB), indeed 25% of the Borough has neither designation but TWBC prefers to build where commuting to London is easiest, as developers will make more money.

Issue 2 – Green Belt Review Methodology

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



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It appears to have been commissioned to reduce the apparent assessment of harm from the allocations in Capel and to enable the plan to contain the huge Capel allocations.

- Q4. Where the release of land from the Green Belt was found to have either high or very high levels of harm, how was this taken into account in the site selection process? **Not at all. The definitions of Tudeley and East Capel harm to the Green Belt were down graded to justify their selection.**
- Q6. Paragraph 144 of the Framework states that if it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

Has the Council carried out an assessment of existing settlements 'washed-over' by the Green Belt? Are any changes proposed and/or necessary?

We believe there is a case for extending the LBD of Five Oak Green rather than to build new towns in open countryside.

Issue 3 – Exceptional Circumstances

- Q1. At a strategic level, do exceptional circumstances exist to alter the Green Belt boundary, having particular regard to paragraphs 140 – 143 of the Framework? If not, how could housing and employment needs be met in other ways?

We believe that there are no 'exceptional circumstances' here to justify release of these sites from the Green Belt. 'Exceptional' must mean out of the ordinary. TWBC argues that the fact of the OAN constitutes an exceptional circumstance. However, this is not unique to Tunbridge Wells but is an issue throughout the MGB, so is not "exceptional". According to the London Green Belt Council 82% of LPAs with Metropolitan Green Belt Land are planning to release some of it – so these circumstances are commonplace, not extraordinary. This conflict in policies (which affects Green Belts across the country) needs to be dealt with by Central Government, by making their policies on housing targets and Green Belt mutually compatible.