

Elizabeth Strang: Respondent No: 1273442 : Member of SRCAG (Speldhurst Road Community Action Group) formed to protect the Green Belt in ALRTW/5

Submission for Hearing Stage 2.

Matter 3 Issue 4. Management of Development in the Green Belt

Q2. Where new Development is proposed in the Green Belt, is STR9 justified, effective and consistent with national planning policy?

I claim that the STR9 is not justified, effective and consistent with the NPPF. In STR9 the Council is constantly and consistently quoting from the NPPF, but then does not keep to it, rather they contradict it. The points I refer to, in particular, as quoted in the Council's STR9 Green Highlighted area, are: -

1. The fact that the Council Claims that their decision to remove certain areas from the Green Belt has been fully justified because of their ***consideration of reasonable alternatives***, and
2. The fact that they claim this decision is supported by "**exceptional circumstances**" which they say they have proved to us.

I would claim that they have done neither of these things.

In 4.124 of STR9 Council refers us back to **Place Shaping Policies in Section 5**. I have read this very carefully, encouraged by the claim in 5.2 that they are going to provide clarity on their planning policy approach. Alas this is not so.

Place Shaping Policies refers specifically to Tunbridge Wells. You will be aware that TWBC is planning to carry out a major re-appraisal of the Town Centre with a New Town Centre Plan. This has not yet been put in place therefore its outcome and conclusions cannot be included in the current Borough PSLP. In fact, as announced the Council's latest "Local" Magazine, (Spring 2022), the Draft plan will be ready by 2023 and the final plan published in 2025

In Place Shaping Policies Council makes many references as to how the Town centre has changed radically because of Covid, how retail shopping has changed because of Covid, etc. To quote 5.25 "*It is widely accepted that the role of Town Centres needs to change and adapt to change in shopping patterns and behaviours, in particular the impact of internet shopping*" It goes on to say how vital it is to "*consider the important contribution that new residential development within the centre could have on helping to increase footfall, contributing to the vibrancy and vitality of the surrounding commercial uses*"

Council then, from 5.28 onwards, list sites that can provide such residential accommodation. They also say on two occasions that “further work needs to be done” and that these decisions “are still ongoing”.

If I understand correctly, Council is saying that the Town centre needs to have an injection of vitality and vibrancy to rescue it from its post Covid torpor, that residential sites can achieve this. They then provide us with such sites but say they are still working on this.

Why then are they removing the Green Belt now? Green belt that once taken cannot be returned and is lost forever. Why are they not waiting to **consider these reasonable alternatives** that they themselves say exist, and thus keep to their own strictures in STR9 and the NPPF? How can they possibly say that the need for housing constitutes **exceptional circumstances** justifying the removal of Green Belt when they have not looked at the **reasonable alternatives**. Surely there are sites which should not be removed from Green belt at this stage, if ever. The onus is on TWBC to prove, as and when the Town Plan is complete, and all other alternatives have been studied in detail and found inadequate, that such a decision is their only course of action, and thus constitutes exceptional circumstances.

Matter 4. Principle of Green Belt Release:

Issue 1. Principle of Green Belt Release.

Q 3. TWBC have **not** made as much use as possible of suitable brownfield sites and underutilised land.

As stated earlier in this submission, TWBC in their PSLP Section 5: Place Shaping Policies pg. 79 5.28 go to the trouble to give us a list of sites in Tunbridge Wells Town Centre where possible residential accommodation can be built. I quote.

1. The Royal Victoria Place Shopping Centre *“There is the opportunity for greater mix and diversity ... as well as the possibility of **residential** on the upper floors*
2. The Civic Centre *this site offers scope for a **mixed-use** scheme .*
3. The former cinema site. We know that this will be **residential** and the developers intend to build between 150 and 180 apartments.

4. Mount Pleasant Avenue car park and the Great Hall Car Park ... *this site could be redeveloped for other town centre uses ... including **residential**...*
5. Torrington and Vale Avenue ... ***residential** development would be appropriate in this location.*

As well as this there are other sites, in particular Hermes House, (which I mention because of its proximity to ALRTW/5 on which 100 houses are planned). We are told that Hermes House is where “43 much needed homes are to be built ...

These sites, which TWBC list, will surely produce a substantial quantity of affordable housing. As you can see from above, more than **200** are already *guaranteed*. Logically and morally surely the council should wait until they have carried out their Town Centre plan and examined these sites, and the figures involved, in detail. Until that is done TWBC cannot say that they “*have examined fully all other reasonable options for meeting its need for housing*”. By their own admission they will not have done this until 2025. Alas by then a lot of the Green Belt will be lost forever unless we delay these decisions.

Thus, to answer the second half of **Q3**. The Preparation of the Plan has **not** sought to make as much use of possible brownfield sites because, strangely and illogically, the Town Centre is not included in the Borough PSLP. The Town Centre has many such sites to offer which are not even under consideration in the current plan.

Q4. Yes! Housing needs can be met by optimising the use of previously developed land without releasing areas of Green Belt.

Q5. If not, why not? Because possible Town centre sites have **not** yet been considered fully and will not be until next year at the earliest.

Matter 4 : Issue 2: Green Belt Methodology Q.1,2,3

Green Belt Study 1 (Nov 2106) began by considering all the Green Belt areas in the borough and then analysing them in depth with the aim of rating them by their importance to the aims of the Green Belt (NPPF. 138)

In **Green Belt Study 2** (July 2017) Some of these sites were then altered and divided up into areas of lesser or greater harm if removed from the Green Belt. It was difficult to find any consistent logic in this practice but one of the justifications for choosing these “lesser” areas was that they were contiguous with other housing. This seems rather to contradict one of the fundamental aims of the Green Belt, which according to the Council’s own words (4.122) is to ***..prevent urban sprawl by keeping land open to maintain the character of the Green Belt.***

In **Green Belt Study 3** (published in November 2020 but not available to the public until after the full council had passed the PSLP on 3rd Feb 2021) the Council decided to actually remove the green belt from some of these “lesser” sites, thus ignoring one of the vital purposes of the Green Belt which they are urged to consider and support which is ***..” the relationship between settlement and countryside and the role in preventing sprawl of large built-up areas and role in separation between towns”*** In fact in some cases (as in ALRTW/5) this role is not even mentioned. This, despite the fact that, only as far back as November 2019 this aspect of the site, and the importance of the extent to which it fulfilled that role, had been deemed vital

If being contiguous to other housing is a justification for removing the green belt, what is the purpose of the Green Belt? Such a practice is corrosive and self-defeating,

Q5 Mitigation. I would like to ask how the Council goes about ensuring that compensatory mitigation is guaranteed. I refer to AL/RTW5 as an example, but I am sure the same concerns are relevant to all sites where mitigation is justified for the removal of green belt. In the Blue Framed summing up of AL/RTW5 (following 5.47 PSLP Reg 19) there are 13 clauses in the Council’s justification for developing this site. In over half of them we find such words and promises as ... *“improve,.. enhanced provision of public space.... natural green spaces,* and the final contradiction in terms *“ecological mitigation”*. It is difficult to imagine how ancient woodland and open grazing pasture can be enhanced by building houses but what steps are being taken by the Council to guarantee that such promises will be kept? Surely, they should be quantified and sited in advance. Should not such things as the promised “arboricultural survey” and the “visual impact assessment” be carried out and made public before the green belt is removed?

Matter 4. Issue 3: Exceptional Circumstances.

Q1. I have answered this previously in my submission and demonstrated where housing needs could be met in other ways (Issue 1 Q3 above)

Matter 5: Issue 1 Site Selection Methodology.

Q1. As referred to in Green Belt Review Methodology Issue 2, The council has relied heavily on the LUC 3 Green Belt Studies, accepting LUC's judgment on sites that have been downgraded from Strong to Moderate to Low in their negative impact on the environment, if removed from the Green Belt. We have already questioned how LUC reached these conclusions. The Council has also allocated sites where the Developer is active, persistent and promising short-term results. Here I use as an example (AL/RTW5). This site, considered ***"unsuitable as a potential site allocation"*** due to ***"landscape impact concerns as well as significant highway concerns"*** in the Council's own words in July 2019, (Site Assessment Sheets) is by November 2021 deemed suitable for development without traffic problems and having low to moderate negative impact on the surrounding countryside if built on. One can only presume that the 21 paged November 2019 response to Local Plan Regulation 18 on behalf of Caenwood Estates and Dandara, and the mitigation and promises contained therein, (see above Q5) were influential on the Council's decision to change their opinion and allocate that particular site.

Q3. The Council also seems to have relied greatly on the Green Belt Studies when assessing the **Landscape Character** and using the LUC judgements. In doing so they have disregarded some of the areas of highly valued rural landscape which, in the past, they themselves have protected: ***"in the interest of visual amenity and to protect the openness of Greenbelt"***. Thus, in their eagerness to find sites to develop, they appear to reverse their own judgements as to what is and is not, land to be protected.

The **best and most versatile agricultural land** should of course be guarded and not developed, but it should also be remembered that some parts of the Green Belt which play a key role in ***"preventing urban sprawl by keeping land permanently open to maintain the character of the Green Belt"*** might not be the best agricultural land but because of their position and situation are equally vital to protect.

As to assessing the local **road network**, and the need for new and **improved infrastructure** (water supply, sewage) the council appears to have left all such considerations to the Developers, relying on them to carry out their own examination and surveys. This seems contrary to common sense and leaves the council open to many future problems. Vital services as road and water supply should be well ensured long before any possibility of development is envisaged, and green belt removed.

Q7. I do not think the selection process was robust. It was certainly not transparent or accountable.