

Tunbridge Wells Borough Local Plan Examination

Hearing Statement prepared on behalf of the Hadlow Estate (hereafter referred to as “The Estate”)
Matter 1 – Green Belt Assessment, Sustainability Appraisal and Local Plan Review

Issue 1 – Green Belt Study Stage 3 Addendum

Q1. Does the Stage 3 Addendum adequately address those concerns raised in the Inspector’s Initial Findings that sites had not been considered on a consistent basis where harm to the Green Belt is concerned?

The answer to this question is yes.

The Inspector’s Initial Findings (Document ID_012) stated at paragraph 6:

*“Green Belt Study Stage 3 only considers sites allocated for development in the submitted Plan - i.e. sites which the Council has already determined are sound and concluded that exceptional circumstances exist to remove them from the Green Belt. If it is accepted that Green Belt land will be required, then **why did the Council not carry out a comparative assessment of reasonable alternatives at Stage 3** in order to avoid, or at least minimise, harmful impacts where possible?” (Emphasis added).*

In summary, it appears that the Inspector was concerned there may have been a failure to assess all reasonable alternatives as part of the Stage 3 Assessment. However, it is noted that there are no concerns expressed with the robustness of the Stage 3 assessment methodology in any other respects – see document PS_035:

“...the Inspector stated that the Stage 3 Green Belt Study was a “logical and sound way of considering where growth should take place”. Consequently, the Green Belt Stage 3 methodology was used to undertake the assessment of additional sites.” (Paragraph 2.7)

As a matter of principle, applying the previously used methodology to the assessment of all reasonable alternatives as done in the Green Belt Study Stage 3 Addendum is therefore an appropriate and robust approach to address the Inspector’s stated concern.

The Green Belt Study Stage 3 Addendum has confirmed that there are **no** other better/preferable reasonable alternatives or other land available to meet TWBC’s identified housing needs (something which the Estate had already understood and considered to be the case in any event).

The Development Strategy Topic Paper Addendum (Document PS_054) confirms at paragraph 2.14:

“The Addendum assesses a total of 71 sites with a SHELAA reference (see table 2.1 of the Addendum), which resulted in 79 parcels being identified with separate harm ratings (see table 3.1). The harm ratings identified in the addendum for the reasonable alternatives are presented alongside the harm ratings for the proposed allocations in the Submission Local Plan in Table 3.1 (page 23) and in map form in Figure 3.1 (page 30).”

In summary therefore, TWBC has considered a comprehensive range of alternatives to its strategy and there simply is no reasonable or preferable alternative beyond release of the identified sites from the Green Belt and there is no other identified site/s which can meet TWBC’s identified housing needs. The Estate maintains its position that this strategy necessarily depends upon release and role of Tudeley Village as part of any sound plan and therefore maintains a strong objection to the soundness of its removal from the plan as part of the Main Modifications and respectfully urges the Inspector to

revisit the initial view expressed in light of all the clear and robust evidence that demonstrates the need for it to be retained in the plan. But without prejudice to that, there will be, in any event, a need for an immediate review of the plan if it is adopted with the Main Modifications proposed, which will require confirmation of role for the Tudeley Village proposal.

Q2. What is the list of reasonable alternative site options in Table 2.1 based on and have an appropriate range of options been tested?

National Planning Policy Guidance (NPPG) states:

“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.” (Paragraph: 018 Reference ID: 11-018-20140306)

NPPG goes on to state:

*“Reasonable alternatives are the different **realistic options** considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”* (emphasis added)

For the purposes of identifying reasonable alternatives for the Stage 3 Assessment Addendum, Document PS_035 explains:

“The Council has carefully considered what constitutes a ‘reasonable alternative’ for the purposes of this Green Belt study. Particular consideration has been given to the Council’s Sustainability Appraisal [CD PS-013] and site assessment work (through the Strategic Housing and Economic Land Availability Assessment (SHELAA) [CD 3.77]). Together, the Sustainability Appraisal and the SHELAA have enabled the Council to decide which sites are reasonable alternatives to be assessed. This includes sites that lie wholly within the Green Belt or partly in Green Belt.” (paragraph 2.2)

The Estate with its particular knowledge and experience of the land within the Council’s area is entirely satisfied that all reasonable alternatives have been considered. Again, it is noted that the Inspector’s Initial Findings did not suggest that either the Council’s Sustainability Appraisal (Document PS-013) or SHELAA (Document CD 3.77) were deficient and had failed to properly identify or assess all reasonable alternative site options and the reality is that this has resulted in a thorough and exhaustive assessment. The Estate considers that it is entirely appropriate for the Council to rely on the Sustainability Appraisal and SHELAA to identify reasonable alternative site options for the purposes of the Stage 3 Addendum Assessment and the process has been comprehensive and exhaustive. The reality is that there are no realistic alternative site options and this has been repeatedly and conclusively demonstrated.

For the purposes of the Stage 3 Addendum the Council have reviewed the list of approximately 300 sites assessed through the Sustainability Appraisal and taken forward those sites which sit wholly or partially within the Green Belt, comprising 71 sites.

Where, correctly, no concerns have been identified by the Inspector in respect of the robustness of the Sustainability Appraisal in that respect, it is considered that the Council have taken a robust and comprehensive approach in relying on the Sustainability Appraisal to identify all reasonable alternative sites for the purposes of the Stage 3 Assessment Addendum. That is, of course, without prejudice to the Estate’s position as to the consequential essential need for the release of Tudeley Village from the Green Belt and allocation in the plan which flows from all of the evidence.

Alternative Strategic Sites in the Green Belt

The Sustainability Appraisal (Document PS-013), paragraphs 6.2.20 to 6.2.29 explains how alternative strategic sites were assessed. The assessment concluded that *none* of the alternative strategic sites considered comprised a 'reasonable alternative'. The Estate agrees fully with that conclusion which is based on clear, sound and comprehensive reasoning and objective analysis.

With specific regard to strategic sites within the Green Belt, Figure 5 and Table 27 (Document PS-013) confirms that there were six strategic sites identified:

- Site 2 – Tudeley/Capel
- Site 6 – Kippings Cross
- Site 8 – Land at Great Bayhall
- Site 11 – Langton Green
- Site 12 – Paddock Wood
- Site 14 – Castle Hill

The Sustainability Appraisal properly excluded four of these sites on the basis that in addition to the Green Belt:

"The sites are within the AONB and the landscape impacts were considered too severe to warrant further consideration as a reasonable alternative." (Table 5, Document PS-013)

The Estate strongly agrees with that approach which is fully supported by the evidence.

This left only the proposed strategic site allocations for Tudeley and Paddock Wood.

The Stage 3 Addendum Assessment further identified that the prospect of having strategic sites within the AONB has been excluded as reasonable alternatives stating (amongst other things):

"It should be noted that the Development Strategy Topic Paper October 2021 (CD 3.126) makes it clear that the Council, in agreement with Natural England, are of the view that strategic development in the AONB is not considered to be a reasonable alternative and so strategic site options that are in the Green Belt and AONB have not been included in this study." (Paragraph 2.6, Document PS_035)

The Estate agrees with that approach and it is obviously sound.

In summary, the Council has correctly concluded through the Sustainability Appraisal process that none of the alternative Green Belt strategic site locations comprised a 'realistic option' and could be taken forward as reasonable alternatives.

Q3. How did the Council use the information from the Stage 3 Addendum to determine whether or not exceptional circumstances exist to alter the Green Belt boundary as proposed by the submission version Local Plan?

The Estate notes that the Inspector's Initial Findings (Document ID_012) stated at paragraph 7:

*“Carrying out a comparative assessment may have resulted in the same sites allocated for development. Just because a site would have a “low” level of harm to the Green Belt does not automatically justify its allocation in the Plan. Other factors, such as the need to promote sustainable patterns of development are also clearly relevant. However, national planning policy is clear that the Government attaches great importance to Green Belts and that boundaries should only be amended in exceptional circumstances. **Reaching that conclusion should be based on a thorough assessment process which includes an understanding of the likely impacts when compared with other site options, especially where the magnitude of harm from the two largest allocations is “high”**”.* (emphasis added)

The Estate considers that the Council's conclusion as to the existence of exceptional circumstances was already fully justified in light of the evidence base it had produced and its approach to promoting sustainable patterns of development which included its assessment of Tudeley Village's credentials in this regard (itself supported by full analysis from the Council and the Estate). As to the further work now done, the Estate notes the following.

The Council's Development Strategy Addendum (Document PS_054) explains how the findings of the Stage 3 Assessment Addendum process have been used:

“2.17 The results of the Green Belt Stage 3 Addendum study have been reviewed by Council officers to principally identify whether the Council's approach to the allocation of sites might change as a result of the Addendum's findings regarding reasonable alternatives.

*2.18 The first step has been to compare the harm rating of sites in the Addendum with the relevant Stage 2 Study's harm ratings. Where the harm rating in the Addendum was the same or higher than in the Stage 2 Study, no further work was considered necessary. **However, where the harm rating in the Addendum was lower than in the Stage 2 Study, those sites have been further reviewed.**”* (Emphasis added).

The Council goes on to explain:

*“2.19 **All sites subject to further review have been re-appraised through the SHELAA process, drawing on the updated Green Belt harm rating.** New ‘SHELAA Addendum’ sheets have been prepared for these sites.”* (Emphasis added).

Finally, the Council explain that:

*“2.20 Sites were also reviewed to determine whether it was necessary for them to be re-appraised through the Sustainability Appraisal (SA) process. It is considered that, in the context of considering “significant environmental effects”, a full re-appraisal was not necessary where there was only an incremental change (i.e. one grade in the Green Belt harm rating scale). However, **all sites with a fall of at least two increments of change in harm rating (e.g. High to Moderate, or Moderate High to Moderate Low), have been re-appraised.**”* (Emphasis added).

The Council has used the Stage 3 Assessment Addendum, alongside the Stage 2 Assessment, as a basis to determine, firstly, if a further SHELAA site assessment was necessary; and secondly, if further SA site assessment was necessary.

The conclusion of this process is set out in Document PS_054 as follows:

“2.22 The overall findings of the review are that the conclusions in the original SA and SHELAA, that resulted in the sites identified as reasonable alternatives not being regarded as suitable for allocation, remain valid.”

The Council go on to explain:

“2.24 In addition, with the obvious exception of the strategic sites, it can be seen that the Council has generally proposed those sites with least harm to the Green Belt. This is evident in Figure 3.1 in the Green Belt Stage 3 Addendum, which shows that the allocated sites (excepting the strategic sites) generally compare favourably in terms of harm rating with the reasonable alternatives in that they generally have lower harm ratings.”

Strategic sites

At paragraph 2.24 (Document PS_054) the Council then specifically identify the approach to be adopted towards strategic sites, in respect of Green Belt harm. The context for that is that through the Sustainability Appraisal process, the Council was unable to identify any reasonable alternative strategic sites (as outlined above). There are no other strategic sites with lower Green Belt harm and no other reasonable alternatives for meeting the identified needs.

Despite there being no reasonable alternative strategic sites available, in the interests of robustness the Council did assess an alternative strategic site through the Stage 3 Assessment Addendum: site reference 445. However, this site was found to be more harmful than the allocated strategic sites at Paddock Wood, and also more harmful than the previously allocated site at Tudeley.

Tudeley

As summarised above, it is apparent from the Stage 3 Assessment Addendum process, that there are no alternative strategic sites available which would result in a lower level of Green Belt harm than Tudeley and there is a clear and obvious need identified given the strategy of the plan and the conspicuous need for the Council to release Tudeley Village from the Green Belt and allocate it. The strong basis for doing so that represents the exceptional circumstances comprise all of the evidence that underpins the Council’s strategy.

Notwithstanding all of that, the Council has proposed the removal of the strategic allocation at Tudeley from the development strategy, but with a consequential need for an early review, following on from the Inspector’s Initial Findings on the purported basis that exceptional circumstances cannot be demonstrated for the following reasons:

*“Impacts on the setting of the AONB, the scale of housing deliverable within the plan period, residual uncertainties about the effectiveness of sustainable transport measures and, by implication, on the ability to satisfy local concerns about traffic in Tonbridge town centre”
(Document PS_054, paragraph 8.1)*

The Estate set out comments in respect of these specific reasons under the relevant questions below. However, as a matter of principle, the Estate strongly disagrees with the approach being suggested of

removal and the inconsistency of approach which now renders the plan unsound and, in any event, a plan which will not deliver the identified needs for the relevant plan period. The reality is that exceptional circumstances continue to exist in clear support of Tudeley Village's allocation, not least in light of the demonstrable absence of any alternative strategic sites of lower Green Belt harm, or indeed any alternative strategic sites at all, or any other sites, to meet the Borough's identified housing needs that are underpinned by its other needs generally (including employment etc). It is difficult to conceive of the existence of more compelling exceptional circumstances than the requirements of the Council area, set within the wider context of the housing and affordable housing crisis nationally, and the recognised need for an early plan review. The proposed Main Modifications simply represent a basic abdication of the responsibility to plan for TWBC's needs now, recognising at the same time that there will be an inevitable need for an early review, but where all of the strong and compelling evidence to plan for TWBC's needs through Tudeley Village has already been provided by TWBC.

Q4. The Stage 3 Addendum found that some sites (around Five Oak Green) would only cause Low or Low-Moderate harm to the Green Belt. Given that the Plan seeks to meet housing needs in full, but will only provide for around 10 years' worth of housing land supply, why have these sites not been considered for allocation as part of the examination of this Plan?

The Five Oak Green sites in question, either individually or cumulatively, are incapable of delivering anything like the growth required, and not a strategic level of growth. The contribution that these sites would make to housing land supply would be very limited and would not extend the plan period to any meaningful extent. Such piecemeal addition without considering the strategic need is therefore unsound.

As stated above, the conclusion of the Stage 3 Assessment Addendum process, is that there are no alternative strategic sites available which would result in a lower level of Green Belt harm than Tudeley. It is thereby evident (if one is considering matters objectively) that an allocation at Tudeley is required and will have to come forward to address those needs.

In recognition of this, the Council have taken what is considered to be a logical approach to the potential further allocation of sites around Five Oak Green:

“The new Stage 3 Addendum Report does consider, under ‘Potential Strategic Harm’, the potential cumulative harm that may arise from the release of sites at Five Oak Green in combination with either STR/SS 1 (Paddock Wood) or STR/SS 3 (Tudeley) (page 33 bullet point 1 and page 34 bullet points 3 and 4).” (Document PS_054, paragraph 2.28)

The Council thereby advise:

“Further consideration of such sites would be best done as part of a Local Plan review.” (Document PS_054, paragraph 2.27)

Given the need for an immediate review of the Plan, it is considered that the approach taken to the Five Oak Green sites is correct and appropriate in circumstances where Tudeley is removed and an early plan review will be essential. This is, of course, without prejudice to the Estate's clear and strong position that the removal of Tudeley Village now is fundamentally unsound and inappropriate.

Q5. Where relevant, have the findings in the Stage 3 Addendum been used to update the Strategic Housing and Economic Land Availability Assessment?

Yes.

The Stage 3 Assessment Addendum has been used to identify sites where the SHELAA should be reviewed. Document PS_054 advises:

“The revised SHELAA sheets for all reviewed Green Belt sites (which include the revised summary from the SA where appropriate), are set out at in PS_036.” (Paragraph 2.21)

Document PS_054 goes on to advise:

“The overall findings of the review are that the conclusions in the original SA and SHELAA, that resulted in the sites identified as reasonable alternatives not being regarded as suitable for allocation, remain valid.” (Paragraph 2.22)

The Estate, with its knowledge and experience of the land in the Council’s area agrees.

Issue 2 – Sustainability Appraisal Addendum

Q1. Has the Sustainability Appraisal Addendum adequately considered the suggested spatial strategy (i.e. a Plan without Tudeley Village and reduced development in East Capel) against reasonable alternative spatial options?

The Sustainability Appraisal Addendum (Document PS_037) states that it has considered eight additional 'strategic growth options', as set out at Table 25. These additional strategic growth options are all predicated on the correct recognition that the Plan without Tudeley Village is not able to meet the identified needs for the Borough:

“The reduction in scale of residential dwellings for the new revised strategic sites will mean a 15-year land supply is no longer possible as total dwellings numbers have declined by some 3,000 on the strategic sites, although the net reduction is less, being partially offset by other factors such as completions and increase windfall allowances.” (Document PS_037, paragraph 6.3.2)

As already noted, the Estate considers that a failure to address the 15-year land supply for a development plan of this kind is fundamentally unsound and there is the strongest of evidential foundations for grasping the nettle properly now, and not abdicating responsibility for the needs that have been identified, and retaining the Tudeley allocation. Its allocation is fully justified by all the evidence that has been collated, including all of the further work that has been done.

Without prejudice to that basic point, and having regard to the additional strategic growth options, we make the following comments:

- Option 14 – This option is reliant upon the Proposed Submission Local Plan (PSLP) scale of growth at Paddock Wood.
- Option 15 – This option is reliant upon the PSLP scale of growth at Paddock Wood.
- Option 16 – Provides only 10 years housing land supply and requires an early review.
- Option 17 – Provides only 10 years housing land supply and requires an early review.
- Option 18 – Provides only 10 years housing land supply and requires an early review.
- Option 12 – Pauses the preparation of the current Plan.
- Option 19A – Provides only 10 years housing land supply and requires an early review.
- Option 19B – Provides only 15 years housing land supply but requires an early review.

The Council have therefore sought to identify a broad range of alternative spatial options (based upon the failure to provide for the needs now if the plan is adopted with the Main Modifications). However, two of the options considered, Option 14 and Option 15, are flawed as they are reliant upon the PSLP scale of growth at Paddock Wood which includes residential development in Flood Zones 2 and 3 and so cannot be considered to be 'reasonable alternatives' in any event. Reliance on these would be misconceived and contrary to very clear policy, as well as being inherently unsustainable in the true sense of the word. All of the reasonable strategic growth options considered necessarily require an early review of the plan in one form or another.

The Sustainability Appraisal Addendum is therefore necessarily predicated on recognition that the Plan is not able to meet the identified needs for the Borough, and therefore an immediate early review

is essential. As the Estate has identified, this approach is unsound and contrary to the clear evidence base which establishes how a sound plan can be adopted with Tudeley Village.

Q.2 If the Plan does not provide sites sufficient to meet the housing requirement, have the implications been considered against reasonable alternative options that would meet housing needs?

The simple answer to this question is no. The most obvious and properly evidentially grounded alternative option to not meeting the housing requirement now is, of course, to meet the housing needs now through the allocation of Tudeley Village. There is a basic failure to deal with this as the sound way forward (as was originally proposed).

Without prejudice to that basic point, it is noted that the Sustainability Assessment Addendum (Document PS_037) has considered three alternative 'strategic growth options' which purport to provide 15 years of housing land supply: Option 14, Option 15 and Option 19B. All other strategic growth options require an immediate review of the plan in one form or another.

As already noted, Option 14 and 15, are reliant upon the PSLP level of growth at Paddock Wood, including residential development in Flood Zones 2 and 3. These options cannot be considered 'reasonable alternatives' at all and are directly contrary to policy and unsustainable in principle. Option 19B, whilst providing a 15-year supply, will nevertheless require an immediate review of the Plan.

In summary, there are no reasonable strategic growth options available which do not require an early review of the plan in one form or another.

The Sustainability Appraisal (Document PS-013) considered potential alternative strategic sites and concluded that *none* of the alternative strategic sites considered comprised a 'reasonable alternative'.

Given that there are no reasonable alternative strategic sites available within the Borough available, there are no alternative strategic growth options which the Council has failed to consider through the Sustainability Appraisal Addendum (again without prejudice to the obvious alternative which should be pursued which is the allocation of Tudeley Village).

This further confirms that it will be essential to carry out an immediate early plan review. Given the absence of any reasonable alternative strategic sites as already demonstrated by the comprehensive evidence base that has been collated, this immediate early review will necessarily require the proposed allocation at Tudeley, as this comprises the only reasonable alternative strategic site in the Borough. This process of allocation ought to occur now.

Issue 3 – Proposed Strategy and Early Review

Q1. What is the justification for suggesting Main Modifications to the Plan, and subsequently requiring an immediate Review, rather than seeking to meet housing needs as part of this examination?

There is no proper or sound justification for this approach. It is inherently unsound. It means adopting a plan which already fails to tackle the needs. It is simply contrary to the evidence base (as now supplemented by further work) which further confirms and endorses the appropriateness of meeting the further housing needs through Tudeley Village. This approach abdicates responsibility for meeting housing needs now in a way which is contrary to national policy (as clearly articulated in the NPPF and all other NPPG and Government policy) and contrary to the housing and affordable housing crisis which applies nationally, but which is applicable in TWBC's area specifically.

The Council's Development Strategy Addendum (Document PS_054) attempts to explain the justification for suggesting the Main Modification to the Plan, but this is necessarily predicated on requiring an immediate Review as follows:

“12.2 The further work that has been carried out in reviewing options for the strategic growth of Paddock Wood has found that it can accommodate major expansion without building homes within higher flood zones, which reduces the overall level of housing on the strategic site by some circa 1,000 dwellings, but the resultant growth, for some 2,450 dwellings, is still capable of supporting the significant improvements in community and transport infrastructure...”

12.4 The decision in relation to Tudeley Village is more nuanced. The more refined assessment of reasonable alternative Green Belt sites has not identified any more appropriate site allocations that would provide any meaningful quantum of housing supply.

12.5 In testing the assumptions underpinning the proposal for Tudeley Village, it is concluded that there remain a number of aspects that give rise to uncertainties regarding the allocation that cannot be resolved within the timeframe of the Local Plan. Such that there are inevitable risks associated with its retention and, indeed, with likely success of adoption of the Local Plan.

12.6 For these reasons, the above Option 5 is the recommended development strategy moving forward. This essentially corresponds to the Inspector's 'Option 3 (Delete the (Tudeley Village)' allocation from the submitted Plan.

12.7 In this scenario, the Local Plan would have to be pursued on the basis that it is only meeting housing needs for the next 10 years and will need to be subject to an early review.”
(Document PS_054)

It is noted that the Development Strategy Addendum (Document PS_054) emphasises at paragraph 3.78 and 12.4 that no reasonable alternatives to Tudeley Village have been identified through the further work that has been undertaken, most notably the Stage 3 Assessment Addendum and the associated SHELAA and SA Addendums. Tudeley Village remains the only reasonable and realistic strategic site available to help meet housing needs in the Borough over the long term. The evidence,

specifically the Sustainability Appraisal Addendum (Document PS_037), confirms that there are no alternative strategic growth options available for meeting housing needs.

The Council correctly recognise that any of the alleged uncertainties that remain regarding the allocation are resolvable. The Estate considers that there are no uncertainties which justify its removal. The Council state that:

“...it is evident from the above review of the most recent information that there would need to be a wide range of further studies to provide the information that the Inspector is seeking. Not only would the commissioning, undertaking, collating, and reviewing of such work take many months...” (Document PS_054, Paragraph 3.76)

The Estate does not consider there to be any further studies necessary, but if there are, these could be undertaken swiftly in any event. Given the absence of alternative strategic sites, the Estate considers that the allocation of Tudeley Village can robustly be included and should be included as part of this Examination based upon the work that has been undertaken to-date. Any residual uncertainties in respect of an allocation in relation to the detail of it are not materially different to any allocation of this kind in a plan. They can be tackled through the correct wording of the allocation policy. Based on all the work already done to date, any outstanding issues, such as they are, can all be resolved through the development management process and its consequential controls, within the context of a robust strategic site allocation.

If, contrary to the above, the Inspector considers that further work may still be required before Tudeley Village can be allocated, it is imperative that any such work on the part of the Council is identified now and that the Plan identifies that the work should take place now so that the early plan review can properly address in more detail the merits of the Tudeley Village proposal as soon as possible, otherwise the plan will be even more unsound.

In summary, the Estate’s position remains that Tudeley Village is the appropriate solution for meeting the Borough housing needs, this has been fully demonstrated by all the detailed assessment work that has already taken place, any matters of detail can be controlled through the wording of the policy allocation and the development management process, and the allocation should be reinserted. Without prejudice to this, even if it were not, it is essential that any further work required begins now and it is appropriate to recognise this as part of the early review policy.

Q2. How would the Council's intended early review of the Plan be controlled? What would be the implications (if any) if an update to the Plan was either significantly delayed or not prepared at all?

Without prejudice to the Estate's principal position that Tudeley Village should be allocated now, it is essential that the early plan review needs to be clearly identified as part of the adoption of this Plan and controls imposed address any prospect of delay or failure of preparation. The negative implications of any update to the Plan being delayed or not prepared are significant. The absence of an up-to-date plan will mean a significant shortfall in housing and affordable housing, further exacerbating acute housing and affordable housing needs in the Borough. It will also undermine the ability of the Council to properly manage and control development within the Borough with the potential for significant detrimental implications for local communities. Therefore, the adopted Plan needs to make it clear that the early plan review needs to start immediately and proceed quickly. It should also deal specifically with the identification of Tudeley Village as a proposed focus of growth. A timescale for the early plan review should be set in the adopted Plan to reflect this. The proper way to address the problem of future delay / failure in preparation is to build in a presumption, or policy recognition now, that Tudeley Village is a focus for further growth to meet TWBC's needs through the early plan review process. This would properly reflect all of the evidence base and material collated to date. The policy should therefore articulate that proposals for new development at Tudeley Village will be supported in principle subject to the conclusions of the early plan review (provided that review takes place in the next two years), and that policy support will be relevant to the existence of very special circumstances justifying development in the Green Belt in this location.

Q3. The Development Strategy Topic Paper Addendum states that “...other distribution options that may provide the full 15 years’ housing land supply were assessed as part of the formulation of the Pre-Submission Local Plan through rigorous consideration. However, there was not an obvious alternative strategy to the one proposed at the SLP stage.” What is the justification, therefore, of seeking an early review to the Plan if options without Tudeley Village have already been considered and discounted?

There is no justification for this as compared with the allocation of Tudeley Village now, where that allocation is already underpinned by the evidence base.

The Estate considers that Tudeley Village should remain allocated. The evidence in support of the PSLP clearly demonstrates that there was not an alternative strategy to the allocation of Tudeley Village and the expansion of Paddock Wood.

The Sustainability Appraisal (Document PS-013) considered potential alternative strategic sites and concluded that *none* of the alternative strategic sites comprised a ‘reasonable alternative’ to Tudeley Village and the expansion of Paddock Wood. There are no other sites that can address TWBC’s needs.

It is noted that the Inspector has not raised any concerns with the robustness of the SA process, the filtering process for the selection of strategic sites, or the absence of reasonable alternative strategic sites being identified through the Sustainability Appraisal process.

It is noted that the Inspector has raised some concerns in the Initial Findings in respect of the allocation of Tudeley Village, with further work required to address these points. The Estate considers that any work for such an allocation has now been undertaken and it objectively confirms that there remains a compelling justification for allocating Tudeley Village now and clear exceptional circumstances for its removal from the Green Belt. To the extent that there remain any outstanding issues in respect of Tudeley Village, these are the sort of details which one would ordinarily expect to exist in respect of strategic allocations which will be subject to the controls that exist in the development management process.

There therefore remains a clear justification for allocation of Tudeley Village now and no proper justification for its removal. The Council is satisfied that alternative distribution options have been rigorously assessed and rejected and nothing has changed in that respect. The Sustainability Appraisal Addendum (Document PS_037) confirms that there are no reasonable strategic growth options available which can meet the Borough’s housing needs without the inclusion of Tudeley Village. Given that there are no reasonable alternative strategic sites within the Borough available, it can be concluded that there are no alternative strategic growth options which the Council has failed to consider through the Sustainability Appraisal Addendum.

All further work has confirmed that conclusion. An early review of the plan simply puts off the issue of the allocation, but where all the necessary work has been undertaken to justify that allocation now. The Estate therefore strongly submit that the allocation of Tudeley Village should be retained now, so rendering the need for an early plan review (which will inevitably involve the same assessment process that has already been undertaken) unnecessary and the needs of TWBC can be properly planned for now, as national policy requires.