

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Hearing Statement

Matter 1: Green Belt Assessment, Sustainability Appraisal and Local Plan Review

Issue 1: Green Belt Study Stage 3 Addendum

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Matter 1 – Green Belt Assessment, Sustainability Appraisal and Local Plan Review

Issue 1 – Green Belt Study Stage 3 Addendum

Inspector’s Question 1: [re. consideration of sites on a consistent basis]

Does the Stage 3 Addendum¹ 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?

TWBC response to Question 1

Introduction

Existing Green Belt studies

1. The Submission Local Plan is supported by a series of Green Belt studies that covered the whole of the Green Belt within the Borough that started with broad areas and parcels and culminated in site specific assessments. The first assessment, the Green Belt Strategic Study (2016) [[CD 3.93a](#)], referred to as the Stage 1 study, was a high level study through which areas were identified for a more detailed study.
2. The Stage 2 Tunbridge Wells Green Belt Study (2017) [[CD 3.93b\(i\)](#)] comprised a more detailed and focussed review of 37 assessment parcels and 10 broad areas identified around settlements in the Strategic Stage 1 Study. Using a consistent approach of assessing their contribution to each of the five Green Belt purposes, as set out in the NPPF (Paragraph 143), it provided an overall rating of potential harm (to the Green Belt) that could result from release of the area or parcel, based on the highest level of contribution from any one of the purposes.

¹ Examination Document [PS_035](#)

3. The harm ratings for each purpose, and the overall harm (based on the highest rating), identified in the Stage 2 Green Belt Study were used to assist the Borough Council in coming to a view on potential allocations within the Green Belt. For full details of the methodologies, please refer to the original Green Belt Studies referenced above [[CD 3.93a](#)] and previous hearing statements in particular Matter 4 Principles of Green Belt release and Issue 2 Green Belt Review Methodology [see [here](#)].
4. Those sites considered suitable for allocation in all respects, after taking all planning matters into consideration, were included within a Stage 3 Green Belt Study (2020) [[CD 3.93c](#)]. The purpose of the Stage 3 study was to consider in more detail the potential harm to the Green Belt purposes of the release of these sites, and how Green Belt harm could be mitigated to inform the policy requirements/wording for individual site allocations, as well as further masterplanning work.

Inspector's initial findings

5. The Inspector's initial findings were issued in November 2022 ([ID-012](#)). The Inspector accepted that, given 22% of the borough is within the Metropolitan Green Belt, to deliver the development set out in the Plan, it was "*likely to require the use of some Green Belt land*" and that the Council's strategy was in principle "*reasonable and appropriate*" (ID-012 – paragraph 4).
6. The Inspector noted that Green Belt boundaries should only be amended in 'exceptional circumstances', adding "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'" (ID-012 – paragraph 7). He found that the Council's Stage 3 study was "*a logical and sound way of considering where growth should take place*" (ID-012 – paragraph 5), but posed the question:

"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?" (ID-012 – paragraph 6).
7. The Inspector then concluded that:

“Further work is therefore necessary before a conclusion can be reached that exceptional circumstances exist to release the relevant site allocations from the Green Belt” (ID-012 – paragraph 8).

8. In response to the Inspectors initial findings the Council advised the Inspector by letter on 17 February 2023 [[TWLP 107](#)] of the steps it intended to take to address the matters raised with regards Green Belt Matters as follows:

“Regarding Green Belt Assessment and Development Strategy the updated work will comprise a comparative assessment of all reasonable alternatives (c70-75 sites) wholly or partially within the Green Belt, with an overall harm rating and noting any variation in harm across a site and setting out the potential for mitigation measures.

Following the Green Belt Assessment there will be a review of the relevant SHELAA assessments and Sustainability Appraisal.

The further work will be presented in an updated and revised Housing and Development Strategy Topic Paper”.

9. The Stage 3 Green Belt Addendum [[PS 035](#)] was commissioned to directly respond to the matters raised in the Inspectors Initial Findings and to provide the comparative assessment required. The assessment was carried out independently by the same consultants used to prepare the previous Stage 1, 2 and 3 Green Belt studies, to ensure a consistency of approach.

Consideration

10. The methodology for the consideration of reasonable alternatives in the addendum [[PS 035](#) Chapter 2] acknowledges (paragraph 2.9) that these are not proposed allocation sites (as was the case with the original stage 3 Study) where suggested mitigation was used to inform site allocation policy text in the Submission Local Plan. Importantly, potential mitigation measures have still been considered by the Stage 3 Addendum, as part of the assessment process that could be used to inform allocation policies in the future, should sites be considered suitable for allocation.
11. Where mitigation measures have been suggested they are not based on any analysis of developer proposals, because such proposals vary from site to site in terms of level of detail and degree of evolution, but they do relate to potential development sites, or

identified sub-areas within them. In adopting this approach, the study ensures consistency across both the proposed allocation sites included in the Submission Local Plan and the reasonable alternatives.

12. It is important to note that potential mitigation measures considered in the 2020 Stage 3 study for the proposed allocations, and those considered in the Stage 3 Addendum for the reasonable alternatives, have no bearing on the harm ratings assigned to them.
13. Paragraph 3.56 of the original [Stage 3 report](#), noted that this was because the potential impact of mitigation measures “*will depend on the way in which mitigation is applied, and the timescale over which it becomes effective*”. This point is reiterated in the Stage 3 Addendum at paragraph 2.10 so, there is no inconsistency between the original study and this addendum in terms of harm ratings.
14. Whilst there is potential for mitigation to reduce harm – for example through woodland planting to strengthen a boundary – this can take a significant time to have an effect and so LUC’s methodology does not make assumptions regarding the impact of the mitigation. This approach is an entirely reasonable and appropriately proportional approach and is one that has been used in other LUC Green Belt assessments in support of Local Plans that have been found sound.
15. The original Stage 3 assessment includes variation in harm across sites. To ensure consistency the assessment of reasonable alternatives identifies any variations in harm in the area covered by SHELAA sites through breaking it down into parcels of similar harm (down to a minimum of 1 hectare) e.g. RA/CA1 (page A-3). This recognises the fact that were a release of Green Belt land to be considered it may not need to encompass a whole site.
16. The Stage 3 Addendum (Chapter 4 pages 31 to 34) also considers, in qualitative terms, the potential cumulative harm of Green Belt releases – identifying areas where release of multiple sites could have a significant impact on the Green Belt purposes.
17. In considering the reasonable alternatives it should be noted that some sites are closely related to others – either lying alongside each other adjacent to an urban edge or, in some cases, one site lying between the urban edge and the other site. In such cases the analysis has been presented for groups of sites, rather than individual sites,

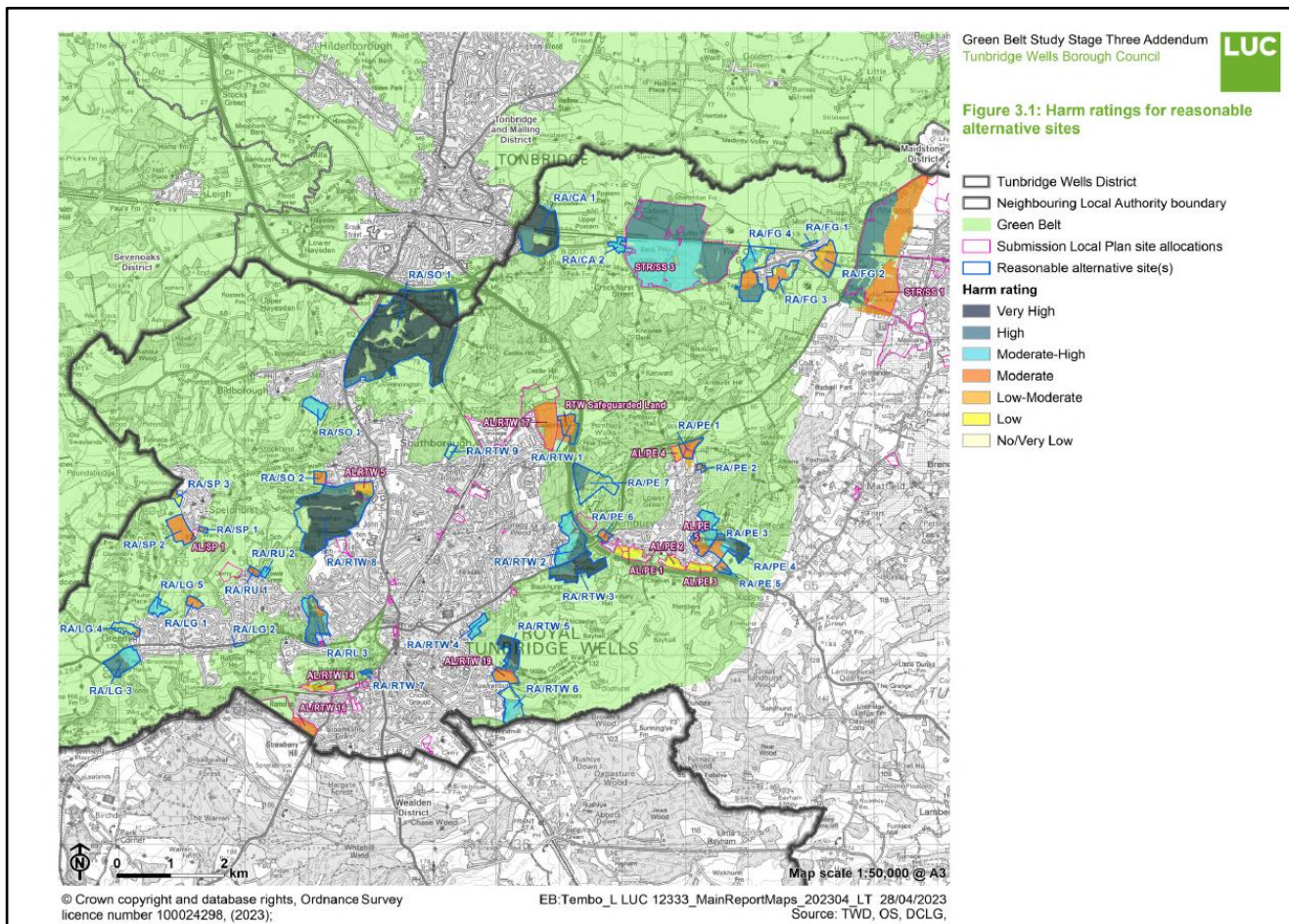
reflecting the fact that any consideration by TWBC of potential Green Belt release as part of an allocation may encompass more than one site (or parts of more than one site). For each assessment encompassing multiple sites a summary table clearly indicates the harm rating(s) applicable to each individual site or part-site. This is a rational and proportionate approach.

18. Each mapped variation in harm is assigned a parcel reference and supported by separate ratings and analysis for Green Belt contribution, impact of release on adjacent Green Belt and overall harm. This means that there is no need to present any analysis under the subheading 'variations in harm' (the approach used when presenting outputs for areas of proposed release in the Stage 3 assessment of allocations).
19. The boundaries for assessed sites or groups of sites in some cases include additional land outside of a site. This applies to cases where the release of the site(s) without also releasing the additional land would leave an orphaned area of Green Belt, or an otherwise illogical Green Belt boundary.

Conclusion

20. The Green Belt Stage 3 Addendum does, therefore, appropriately address those concerns raised in the Inspector's Initial Findings that sites had not been considered on a consistent basis.
21. The Green Belt Stage 3 Addendum has used a consistent methodology to provide a comparative study of the sites considered to be reasonable alternatives, against sites proposed for allocation in the Submission Local Plan. It does provide the same information as the original Stage 3 Study in terms of:
 - Describing the relationship with settlement
 - An assessment of the contribution to Green Belt purposes
 - An assessment of the impact on adjacent Green Belt
 - A summary of harm
 - Consideration of potential mitigation measures

22. The findings are most clearly presented in the Addendum in Table 3.1 and in Figure 3.1 'Harm rating summary for allocated and reasonable alternative sites'. The figure is reproduced below and illustrates the findings of both the original Stage 3 study and the addendum in a comparative way.



Inspector's Question 2: [re. list of alternatives and range of options]

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

TWBC response to Question 2

Introduction

23. The Council's approach to the identification of 'reasonable alternatives' is set out within the Stage 3 Green Belt Addendum [[PS 035](#)] at paragraphs 2.2 to 2.6. This explains that the identification of sites was based on the Council's Sustainability Appraisal [[PS 013](#)] and site assessment work through the Strategic Housing and Economic Land Availability Assessment (SHELAA [[CD 3.77](#)]) and that for the purposes of this Study, 'reasonable alternatives' are taken to be all sites that were considered reasonable alternatives through the Sustainability Appraisal and SHELAA processes that supported the submission Local Plan.
24. The Councils Site Selection Methodology and the robustness of the Councils approach and use of the SHELAA was the subject of an earlier hearing session held on 27 May 2022 ([TWLP/021](#)). That hearing statement explained that "*all sites included in the SHELAA have been assessed using the same methodology, irrespective of size or location, and all sites have been visited by officers*" (paragraph 203) which included the reasonable alternatives.
25. Table 2.1 in the Stage 3 Addendum lists those reasonable alternatives taken from the SHELAA listed by the SHELAA reference number and as such they represent the alternative Green Belt site options in the Submission Local Plan.
26. Table 3.1 in the Stage 3 Addendum lists both the allocations and reasonable alternatives but has in accordance with the methodology carried out the assessment on parcels so that some SHELAA sites are further subdivided.
27. The Green Belt Stage 3 Addendum assesses a total of 71 sites with a SHELAA reference (see table 2.1 of the Green Belt Stage 3 Addendum), which resulted in 79 parcels being identified with separate harm ratings (see table 3.1).

28. 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 the Green Belt Stage 3 Addendum.
29. For clarification, it is noted that while Paddock Wood Reasonable Alternative Option 4 is not specifically included in this Stage 3 Study the area/extent of this spatial option that lies partially within the Green Belt is the same extent of Green Belt land included in the Paddock Wood Reasonable Alternative Option 2. The Paddock Wood Reasonable Alternative Option 2 is proposed strategic site allocation STR/SS1 Paddock Wood and land at East Capel in the Submission Local Plan, which has previously been assessed by the Green Belt Stage 3 Study and so are not included in the Green Belt Stage 3 Addendum.

Consideration

30. The identification of reasonable alternatives is based on the Councils original Sustainability Appraisal and SHELAA work which as part of the Councils Site Selection Methodology is considered to be a robust approach.
31. The results of the Stage 3 Addendum have been taken into account through the revised Sustainability Appraisal [[PS 037](#) Sustainability Appraisal Addendum] and revised SHELAA [[PS 036](#) SHELAA sheets for all reviewed Green Belt sites] to see if they presented any further options to the Council. As highlighted in response to Question 1 above, the methodology for the Stage 3 Addendum considered not only the SHELAA sites but also the potential for partial release of these sites, the release of a combination of these sites and the possible inclusion of adjacent land where appropriate.
32. The Council has excluded from its considerations the option of a strategic site within the AONB as this is not considered a reasonable option, an approach that has been agreed with Natural England.

Conclusion

33. The Council has correctly identified reasonable alternatives using the evidence that underpins the Submission Local Plan and these have been assessed in accordance with the Site Selection Methodology.
34. The Council further considers that it has considered all reasonable alternatives and options within the scope of the Stage 3 Green Belt Study Addendum and the proposed main modifications to the Local Plan, set out in response to the Inspector's initial findings, received November 2022.

Inspector's Question 3: [re. Use of the stage 3 Addendum to determine exceptional circumstances]

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?

TWBC response to Question 3

Introduction

35. The Council's approach to exceptional circumstances for Green Belt release is set out in the Development Strategy Topic Paper ([\[CD 3.126\]](#) Revised October 2021) Section 6.0 I (paginated pages 56 to 79). At paragraph 6.183 the Council identifies the factors it considered contribute to exceptional circumstances specific to the borough and the Submission Local Plan which in summary include:

- A constrained borough (22% Green Belt, 69% AONB, with 74.5% of the Green Belt within the AONB).
- The inevitability that sustainable growth will impact on Green Belt and AONB.
- Increased development requirements over previous plans.
- Need for meeting all development needs in an integrated way
- Neighbouring local authorities unable to meet any housing need arising in Tunbridge Wells Borough.
- Absence of other options for meeting development needs of the borough without releasing land from the Green Belt.

36. The rationale for the release of each particular allocation site is set out in the same document in table 5 page 66. These Borough and site factors remain equally valid for the main modifications now proposed to the development strategy for the submission Local Plan.

Consideration

37. The results of the Green Belt Stage 3 Study Addendum [[PS_035](#)] have been reviewed by Council officers to principally identify whether the Council's approach to the allocation of sites, and consequently any changes to the Green Belt boundary and any change to the consideration of exceptional circumstances, might alter as a result of the Addendum's findings regarding reasonable alternatives.
38. The analysis and summary of findings of the Green Belt Stage 3 Addendum is set out in the Local Plan Development Strategy Topic Paper – Addendum [[PS_054](#)] paragraph 2.17 to 2.28. The section includes a summary of findings which at paragraph 2.22 states that “the conclusions in the original SA and SHELAA [3.77e Capel Site Assessment Sheets SHELAA], that resulted in the sites identified as reasonable alternatives not being regarded as suitable for allocation, remain valid”.
39. The Topic Paper addendum did note at paragraph 2.25 that the Green Belt Stage 3 Addendum recorded a drop in harm such that some sites around Five Oak Green were now comparable in harm to allocated sites and identified those sites as:
- RA/FG1-A Low-Moderate Harm
 - RA/FG2-B Low-Moderate Harm
 - RA/FG2-C Moderate Harm
 - RA/FG3-A Low Harm
 - RA/FG3-B Low-Moderate Harm
 - RA/FG3-C Moderate Harm
 - RA/FG4-A Low Harm
 - RA/FG4-C Moderate Harm
40. For these reasonable alternatives, despite the change in Green Belt Harm the conclusion of the revised SHELAA [[PS_036](#) SHELAA sheets for all reviewed Green Belt sites] is the same as that for the original SHELAA in that one site is suitable for allocation (SHELAA site 143) and all other sites remain unsuitable for allocation. There

is an additional rider added to SHELAA site 11 in that the unsuitability is “*in the context of the Development Strategy, but should Tudeley Village not be proposed, this site could be looked at again, as part of a Local Plan review*”. A summary table of the sites around Five Oak Green noted above is provided in **Appendix 1**.

41. Between them SHELAA site 143 and 11 have a high level indicative capacity of 70 dwellings which the SHELAA Methodology [[3.77a SHELAA Main Report](#)] explains is likely to alter “to reflect the context of the site” (paragraph 3.38) and may be significantly reduced in order to accommodate open space, landscape and ecological mitigation and any necessary infrastructure. Such a number does not make a meaningful contribution to the additional dwellings required beyond 10 years. Before releasing further Green Belt Sites the Council would need to be certain that exceptional circumstances exist for a particular site or sites. As explained in response to Question 4 before concluding on the release of additional Green Belt sites the Council would need to be certain that other sites, including brownfield and non-Green Belt sites if they come forward, were not available following a further call for sites and further assessment.
42. Within the revised development strategy the Council has conceded (Local Plan Development Strategy Topic Paper – Addendum [PS_054](#)) that with regards Tudeley Village that “it cannot be adequately demonstrated that it will meet the threshold for exceptional circumstances to justify its release from the Green Belt...” (page 43 paragraph 8.1 b) and so the Green belt release proposed to accommodate Tudeley village cannot be justified at this time but will need to be seriously considered as part of the review process along with all other reasonable alternatives that present themselves during that process..

Conclusion

43. Given the significant reduction in housing numbers now proposed, through the proposed deletion of Tudeley Garden Village from the Local Plan, and with a reduced scale of growth at Paddock Wood and Land at East Capel, the absence of any clear additional sites and the 10 year, rather than a 15 year housing land supply (with commitment to an early review) the argument in terms of exceptional circumstances for the release of Green Belt to accommodate the remaining allocation sites is considered to be stronger.

44. The Stage 3 Green Belt Study Addendum and associated SHELAA have not identified any significant sites that it considers should be released as part of this Plan and the sites around Five Oak Green that have been assessed as potentially harming the Green Belt with a Low or Low-Moderate Harm generally remain unsuitable for allocation or require further assessment as part of a Local Plan Review.
45. It should be noted that other changes are proposed to the Green Belt boundary from that which is proposed within the submission version of the Local Plan due to other matters raised by the Inspector e.g. Land at Colebrook House (Matter 2 Issue 2 and these are deletions rather than additions and beyond the scope of the Stage 3 Addendum.

Inspector's Question 4: [re. Why have sites around Five Oak Green not been considered?]

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?

TWBC response to Question 4

Introduction

46. The Green Belt Stage 3 Addendum considered all reasonable alternatives and provided a comparative assessment of Green Belt harm with the allocated sites. The findings are most clearly presented in the Addendum in Table 3.1 and Figure 3.1 'Harm rating summary for allocated and reasonable alternative sites' (refer to Question 1 for a copy of Figure 3.1).
47. With the obvious exception of the strategic sites, it can be seen that the Council has generally allocated those sites with least harm to the Green Belt and 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.
48. It is noticeable however, that there are some sites at Five Oak Green where the harm, is predicted to be within the range of Moderate to Low (see pages A-16 to A-57 of the Stage 3 Study Addendum [[PS_035](#)]), which is comparable in Green Belt harm terms to the allocated sites. There is a significant drop in harm for some of these sites when compared to their assessment within the Green Belt Stage 2 study as a result of now being assessed at a site-specific level rather than as part of a larger parcel/broad area. These sites are:
- RA/FG1-A Low-Moderate Harm
 - RA/FG2-B Low-Moderate Harm
 - RA/FG2-C Moderate Harm
 - RA/FG3-A Low Harm
 - RA/FG3-B Low-Moderate Harm

- RA/FG3-C Moderate Harm
- RA/FG4-A Low Harm
- RA/FG4-C Moderate Harm

Consideration

49. All reasonable alternatives, which include the above sites, were subject to further review and have been re-appraised, drawing on the updated Green Belt harm rating. Revised SHELAA sheets have been prepared for all reasonable alternatives (as presented and considered prior to submission) where the harm to the Green Belt was found to have reduced in the Green Belt Stage 3 Addendum (i.e. where the Green Belt harm was the same or worse a new SHELAA assessment sheet was not considered necessary).
50. Revised SHELAA sheets for all relevant Green Belt sites are set out in the 'SHELAA Addendum' (which include the revised summary from the SA where appropriate), in [PS 036](#). An Addendum to the SA is published separately, as document [PS 037](#).
51. As noted in response to Question 3 above and as set out in the summary table at **Appendix 1** the revised SHELAA for the above Green Belt sites concluded that one site is suitable for allocation (SHELAA site 143) and all other sites remain unsuitable for allocation apart from Site 11 which has the rider that it could be looked at again as part of a Local Plan review.
52. The response to Question 3 also explains the limited potential contribution that these two sites might make to housing delivery (circa 70 dwellings). Before releasing further Green Belt Sites the Council would need to be certain that exceptional circumstances exist for these sites and that, as explained in detail in the Development Strategy Topic Paper October 2021 [[CD 3.126](#)], no other non-Green Belt and non-green field sites were not available following its approach in the Submission Local Plan including a 'brownfield first' approach.
53. The Council would also need to consider if it were to release these sites, or any combination of sites around Five Oak Green, what their wider infrastructure requirements would be and how they could be met. Releasing these sites as part of this Plan would inevitably give rise to questions about deliverability, viability and sustainability, particularly with regards exceptional circumstances, that the Council can

best answer through a Local Plan review. Furthermore, assessment work needed for the sites would result in an inevitable delay to the Local Plan examination, and the consequential adoption of the Local Plan.

54. Consideration was given, in the Local Plan Development Strategy Topic Paper Addendum, to the possible release of sites previously considered unsuitable (Option 7 under section 9 Development Strategy Options) where this option was considered to represent a “pause” in the Plan as it would “inevitably take some time to gather more and updated evidence and reassess possible site allocation options”.
55. The overall findings of the review are that the conclusions in the original Sustainability Appraisal [\[PS_013\]](#) and SHELAA [\[CD_3.44a\]](#), that resulted in the sites (identified for the Green Belt Stage 3 Study Addendum as reasonable alternatives) not being regarded as suitable for allocation, generally remain valid because for most sites there are other factors that lead officers to conclude a site was not suitable for allocation.
56. A summary table of the reasonable alternatives assessed around Five Oak Green can be found in **Appendix 1**. This includes the conclusions for these sites taken from the original SHELAA [\[CD_3.77e\]](#) and the SHELAA Addendum [\[PS_036\]](#), the reference for the site in the SHELAA, the findings of Green Belt Stage 2 Study and Stage 3 Study Addendum as well as the indicative yield from the SHELAA.
57. The Local Plan Development Strategy Topic Paper – Addendum [\[PS_054\]](#) considers the findings of the Green Belt Stage 3 Study Addendum and the implications for the development strategy. It is clear at paragraph 8.1 a) that the results “*do not provide a basis for concluding that other previously rejected “omission sites” should come forward into the Local Plan, save for a couple of possible small-scale exceptions*”.
58. With respect to the ‘small-scale exemptions’, which are the sites around Five Oak Green and in particular SHELAA site 143 and 11, it goes on to note that they would not “*provide any meaningful quantum of development*” (paragraph 12.4) and concludes that these sites should be “*further considered as part of the early Local Plan review*”.
59. The evidence required to consider these sites (individually or collectively) e.g. infrastructure needs, effects in relation to existing allocations and/or other omission sites, demonstration of exceptional circumstances etc. would take time and would

require a pause in the examination of the Plan which would not be proportionate given the likely contribution to housing supply the sites would make (as set out under Option 7 in the Local Plan Development Strategy Topic Paper – Addendum [[PS_054](#)], section 9 paragraph 9.12).

Conclusion

60. The release of some or all of these sites or a wider area would represent an entirely different strategy to that proposed in the Submission Local Plan or indeed the proposed modified strategy.
61. The implications of such a release alone or in combination has not yet been assessed and would be considered premature without the necessary studies to identify and evaluate the requisite infrastructure needed to make such a release acceptable. It is not possible to undertake the necessary studies within the scope of the plan currently under examination without risking significant further delay and challenges to the submission Local Plan.
62. Whilst an argument may be made that the release of these sites would provide additional housing needed beyond the now proposed shorter timescale it should be noted, notwithstanding other concerns, that they would not come close to the numbers that would have been provided at Tudeley and Paddock Wood in the Submission Local Plan particularly when the inclusion of open space, landscape and ecological mitigation and any necessary infrastructure are taken into account. In addition, the release of one or more of these sites may compromise a future strategy in terms of its ability to deliver wider necessary infrastructure in this part of the Borough.
63. Further consideration of such sites would be best done as part of a Local Plan review where a new or change in the development strategy in relation to proposed strategic development particularly in the area between Tonbridge and Paddock Wood may lead to these sites being reconsidered for potential allocation in relation to their contribution to the Green Belt and any exceptional circumstances that exist at that time. Although it should be noted that there may well be other reasons why these sites may remain unsuitable irrespective of any development strategy.

Inspector’s Question 5: [re. Updating the Strategic Housing and Economic Land Availability Assessment with the Stage 3 addendum findings]

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

TWBC response to Question 5

Introduction

64. All SHELAA sites for the submission Local Plan, which includes the reasonable alternatives, were covered by the Green Belt Stage 2 Study being either within parcels or broad areas. The harm from releasing land within the Green Belt identified in the Stage 2 study was used to inform the original SHELAA sheets.
65. However, it should be noted that the scale of harm used in the Green Belt Stage 2 Study was a 5 point scale and so is slightly different for the Green Belt Stage 3 studies which both had a more refined 7 point scale as illustrated below:

Green Belt Stage 2 Study
Very High
High
Moderate
Low
Very Low

Green Belt Stage 3 Study
Very High
High
Moderate-High
Moderate
Low-Moderate
Low
Very Low

66. It was then necessary for the Council to consider the findings both in terms of the more refined Green Belt Stage 3 Addendum study and the variance in the scale used.

Consideration

67. The results of the Green Belt Stage 3 Addendum study have been used to update both the SHELAA and SA.

68. The results of the Green Belt Stage 3 Addendum study were 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.

69. The first step has been to compare the harm rating of sites in the Addendum with the relevant Stage 2 Study's harm ratings. All sites included within the Stage 3 Addendum have been re-appraised through the SHELAA process, taking account of the more focused site-specific assessment and any revision to the conclusion of likely harm to the Green Belt.

70. 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 to Low), have been re-appraised in the SA Addendum [PS_037 Sustainability Appraisal Addendum].
71. Revised SHELAA sheets have been prepared for all reasonable alternatives where the harm to the Green Belt was found to have reduced in the Green Belt Stage 3 Addendum reduced (i.e. where the Green Belt harm was the same or worse a new SHELAA sheet was not considered necessary) and these can be found in the ‘SHELAA sheets for all reviewed Green Belt sites’ [[PS_036](#)].

Conclusion

72. The findings of the Green Belt Stage 3 Addendum have been reviewed and taken into account both in terms of the Sustainability Appraisal but have also been used to inform a new SHELAA, which comprises a suite of new site assessment sheets for relevant reasonable alternative sites in the Green Belt.
73. The overall findings of the review are that the conclusions in the original SA and SHELAA, remain valid. In general most sites identified as reasonable alternatives are regarded as not suitable for allocation whilst sites could be reconsidered as part of a Local Plan review the Development Strategy Topic Paper Addendum (paragraph 13.2 [[PS_054](#)]) states, *‘there are also other factors to be taken into account in determining their suitability; hence, it is proposed that they are further considered as part of the early Local Plan review’*.
74. An important factor in reaching these conclusions is that there are often other reasons or combinations of reasons, sometimes including Green Belt harm, that led officers to conclude a site was not suitable as a potential allocation in the Local Plan.

Appendices

Appendix 1: Table of SHELAA Sites Around Five Oak Green

Relevant document links:

Original SHELAA Sheets: Capel Site Assessment Sheets SHELAA [\[CD 3.77e\]](#)

Revised SHELAA Sheets: SHELAA: Reasonable Alternative Green Belt Sites [\[PS 036\]](#)

Stage 2 Tunbridge Wells Green Belt Study (2017) [\[CD 3.93b\(i\)\]](#)

Stage 3 Green Belt Study (2020) [\[CD 3.93c\]](#).

Stage 3 Green Belt Study Addendum [\[PS 035\]](#)

SHELAA Sheet #	GB Stage 2 Reference and harm	GB Stage 3 Addendum Reference and harm	SHELAA conclusion Original SHELAA in bold Revised SHELAA <i>in italics</i>	Possible housing yield
216	Broad Area 4 Very High Harm	RA/FG1-A Low-Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	32
No SHELAA	Broad Area 3 Very High Harm	RA/FG2-A	N/A	Not submitted as community facility
11	Broad Area 4 Very High Harm	RA/FG2-B Low-Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation in the context of the Development Strategy, but should Tudeley Village not be proposed, this site could be looked at again, as part of a Local Plan review.</i>	49

SHELAA Sheet #	GB Stage 2 Reference and harm	GB Stage 3 Addendum Reference and harm	SHELAA conclusion Original SHELAA in bold Revised SHELAA <i>in italics</i>	Possible housing yield
307	FG4 Moderate Harm	RA/FG2-C Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	114
387	Broad Area 3 Very High Harm	RA/FG2-C Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	Less than 10
143	FG3 Moderate Harm	RA/FG3-A Low Harm	This site is considered suitable as a potential site allocation. <i>This site is considered suitable as a potential site allocation.</i>	21
FS9	Broad Area 3 Very High Harm	RA/FG3-B Low-Moderate Harm	This site is considered unsuitable as a potential site allocation.	59
LS12	Broad Area 3 Very High Harm	RA/FG3-B Low-Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	60
48	FG3 Moderate Harm	RA/FG3-C Moderate Harm	This site is considered unsuitable as a potential site allocation.	21
LS10	FG3 Moderate Harm	RA/FG3-C Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	20

SHELAA Sheet #	GB Stage 2 Reference and harm	GB Stage 3 Addendum Reference and harm	SHELAA conclusion Original SHELAA in bold Revised SHELAA <i>in italics</i>	Possible housing yield
LS29	FG3 Moderate Harm	RA/FG3-C Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	181
331	FG1 Moderate	RA/FG4-A Low Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	88
329	FG1 Moderate	RA/FG4-B Moderate - High	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	219
331 Repeat as split across two areas	FG1 Moderate	RA/FG4-B Moderate - High	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	Included in 331 above
330	FG1 Moderate	N/A	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	10 or less
450	FG2 High	RA/FG4-C Moderate Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	200
451	Broad Area 3 Very High Harm	RA/FG4-D High Harm	This site is considered unsuitable as a potential site allocation.	153

SHELAA Sheet #	GB Stage 2 Reference and harm	GB Stage 3 Addendum Reference and harm	SHELAA conclusion Original SHELAA in bold Revised SHELAA <i>in italics</i>	Possible housing yield
			<i>This site is considered unsuitable as a potential site allocation.</i>	
FS6	Broad Area 3 Very High Harm	RA/FG4-D High Harm	This site is considered unsuitable as a potential site allocation. <i>This site is considered unsuitable as a potential site allocation.</i>	Less than 10 units.