

## **Examination of the Tunbridge Wells Borough Local Plan – Stage 2 - May to July 2022**

Hearing Statement by **Mr PETER AVGHERINOS** on **Matter 2** of the Inspector’s “**Matters, Issues and Questions for Stage 2 – Revised**”.

I have made earlier representations in the Local Plan consultation process at Stages 18 and 19, including expressing concerns about the proposed management of the Green Belt.

### **Matter 2 – Housing and Employment Needs**

#### **Issue 1 - Housing Needs and the Housing Requirement**

##### *Question 3.*

In their submitted Local Plans, TWBC and its neighbours have struggled to find enough building land to meet their assessed housing needs without encroaching on currently protected land (AONB, Green Belt). Their obligation to meet housing need can then only be met by releasing sites from the Green Belt/AONB under the exceptional circumstances provision in the NPPF.

The Duty to Co-operate requires boroughs to assist their neighbours in meeting unmet assessed housing need. Green Belt land releases in some Boroughs may then exceed their own requirements as part of achieving the overall assessed housing need for the region. To be fair and democratic, this process requires that all the Boroughs are using compatible procedures to evaluate the negatives to society and the environment locally of a Green Belt release against the positives overall from the met housing need. What has TWBC done to confirm their neighbours are adopting equivalent criteria to their own in identifying the least harmful sites for Green Belt release?

Sevenoaks BC, for example, is proposing to release only a tiny proportion of its vast tracts of undeveloped Green Belt (239ha of 35,000ha = 0.7%), whilst TWBC has scheduled for release a far higher proportion of its limited Green Belt (407ha of 7100ha = 5.7%). Further Sevenoaks propose to defer much of their release until a future revision of their Plan confirms its necessity. All the TWBC release is currently immediate on Plan confirmation. The figures and timings show a very different application of the exceptional circumstances Green Belt release provisions in the two Boroughs. If it results in Green Belt

sites being released in TWBC to preserve equivalent or lesser value sites within SBC that will be a travesty.

Before TWBC makes any releases of Green Belt land for the benefit of its neighbours, they need to show that any nett harm to this Borough is justified by the greater social and environmental damage that would otherwise result elsewhere. What evidence is there to support this? None has been produced.

TWBC's Local Plan was adopted by full council after urgings that all the site allocations in the Plan, including all the Green Belt sites, were essential to meet TWBC's own assessed housing need. Further Council not approving the PSLP would result in anarchy in the Borough's planning.

It is distressing to find out during this Examination that TWBC now find a significant surplus in their plan's site allocations over their assessed statutory housing need. Many of the allotted sites are bitterly opposed within the Borough, particularly in terms of harm to the Green Belt. Nevertheless, the Council continues with the Plan and all its site allocations, and with the intention for immediate full implementation.

Opportunistically, they may be prepared to ignore the interests of their own residents and offer without proper diligence the artificial surplus to neighbouring boroughs.

The Duty to Co-operate exists to minimise the problem of meeting regional housing need across neighbouring boroughs, but that implies proper evaluation of the social and environmental costs and benefits of transferring housing need between boroughs. The result must show a nett benefit for the region. In the present situation, we have seen no evidence that the standards for Green Belt release in Sevenoaks and Tunbridge Wells, say, produce similar results in terms of damage caused by Green Belt release. The above figures suggest Sevenoaks has been far more averse to releasing their Green Belt. If there is no evidence that other Boroughs are truly in need of assistance, then sites in Tunbridge Wells that are surplus to TWBC's housing need should be de-selected from the TWBC Local Plan.