

Representor number
PSLP_2048 to PSLP_2052

MATTER 4– PRINCIPLE OF GREEN BELT RELEASE

TUNBRIDGE WELLS LOCAL PLAN

Prepared by Pro Vision on behalf of Cooper Estates Strategic Land Limited

MAY 2022

Representor number
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TUNBRIDGE WELLS LOCAL PLAN

MATTER 4– PRINCIPLE OF GREEN BELT RELEASE
PROJECT NO. 2133

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MAY 2022

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1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Pro Vision on behalf of Cooper Estates Strategic Land Limited (“CESL”) who are promoting Land at Sandown Park¹ for a Care Community² within Use Class C2 to provide 108 extra care units with communal care and wellbeing facilities.
- 1.2 The Inspector will be aware through correspondence³ on behalf of CESL, that we have long been concerned that plan-making by Tunbridge Wells Borough Council (“TWBC”, “the LPA” or “the Council”) has failed its legal duties. Our submissions in relation to Matter 1 concluded that the Local Plan Examination should not proceed as the Submission Plan is not legally compliant.
- 1.3 We do not seek to repeat these concerns, but in order to assist the Inspector we provide cross-references to the CESL representations and additional communications previously made where they relate to the specific Stage 2 Examination Questions.
- 1.4 This Representation responds to the Inspector’s questions within Matter 4: Issue 1 and has been prepared in the context of the tests of ‘Soundness’ as set out in Paragraph 35 of the National Planning Policy Framework 2021 which requires that a Plan is:
- Positively Prepared
 - Justified
 - Effective
 - Consistent with national policy
- 1.5 This hearing statement has been prepared in consultation with Gregory Jones QC, Francis Taylor Building, Temple. The structure of the document reflects that in the Stage 2 Matters, Issues and Questions document⁴. In summary, we have identified defects in the Council’s approach to allocation of land in the Green Belt and conclude that it is not robust. We conclude that this is not positive nor effective planning. The plan is therefore unsound.

¹ Regulation 22 version of the SHELAA (Jan 2021) – [Core Document 3.77n - Site 114](#)

² Specifically “Extra Care accommodation” as a category of specialist housing for older people, as defined by the [Planning Practice Guide at Paragraph: 010 Reference ID: 63-010-20190626](#)

³ Representation [PSLP_2048](#), full document at [SI_140](#)

⁴ Examination document [ID05](#)

2.0 Matter 4 Issue 1 – Principle of Green Belt Release

Q1. [Table 6](#) in the submission version Local Plan lists proposed changes to the Green Belt boundary. Are these all the boundary changes that would result from the adoption of the Plan?

2.1 We understand that the proposed sites in the Submission Version of the Plan would result in the changes described in Table 6. However, as is discussed in more detail below, TWBC has failed to demonstrate that it has selected the best sites for development. Accordingly, Table 6 indicates the only Green Belt (GB) boundary changes that might arise from the Council's current preferred strategy. Should other sites be considered in preference, then other GB boundary changes may need to be considered.

Q2. What proportion of new housing proposed in the Plan would be on land currently designated as Green Belt?

2.2 We consider this is for TWBC to answer, though paragraph 5.6 of the Stage 3 GB Assessment⁵ indicates that, within the current development strategy, *"15 sites across TWB will be allocated for development in the TWBLP, of which 14 lie entirely, or in part, within the Green Belt (see Figure 4.1: Draft Allocation Sites). The net area of land to be removed from the Green Belt is 407ha, which equates to approximately 6% of the Green Belt in TWB"*. Figure 4.1 of the Stage 3 Assessment is on page 34 of that document⁶.

2.3 Those 15 sites are then listed throughout the Stage 3 Assessment, however cross-correlation to the Submission Version (SV) of the Plan is then problematic, as the references for the 15 sites in the Stage 3 Assessment mostly do not accord with the site referencing in the SV Plan⁷. Further, there are substantive errors in the Stage 3 document as it appears to assess at least 1 site as a potential allocation site that is not⁸ and assesses at least 1 site singularly that comprises more than one allocation in the plan⁹.

⁵ Core Document [3.141, page 117](#)

⁶ Core Document [3.141, page 34](#)

⁷ For example, "Land adjacent to Longfield Road" is referred to in the Stage 3 GB Assessment as Site RTW12, whereas allocation AL/RTW12 in the SV Plan is a non-Green Belt Site (Land at Tunbridge Wells Telephone Engineering Centre). The Longfield Road site of the Stage 3 GB Assessment is actually allocation AL/RTW17.

⁸ Site RTW13 in the [Stage 3 Assessment](#) lies to the east of SV Plan allocation AL/RTW17. It is not proposed for allocation in the Plan – See [Inset Map Tunbridge Wells NE](#)

⁹ Site AL/PE1 in the [Stage 3 Assessment](#) actually includes both SV allocations [AL/PE1 and AL/PE7](#)

2.4 We believe that at least 3750 dwellings¹⁰ are within Green Belt, with the larger part of the 3490-3950 units proposed at Paddock Wood / East Capel also within GB. In addition, we understand there are 2 employment sites in GB¹¹. Assuming around 2000 of the units at Paddock Wood / East Capel as lying within GB, this would appear to mean that 5750 dwellings of at least 9511 dwellings from proposed allocations (60%) would be located within GB land.

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

- **Makes as much use as possible of suitable brownfield sites and underutilised land;**
- **Optimises the density of development, and**
- **Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need.**

How has the preparation of the Plan sought to make as much use as possible of suitable brownfield sites and optimise the density of development?

2.5 We consider that this question is for TWBC to answer but refer the Inspector to our Matter 1 Statement where we draw attention to the failure of this Council to work effectively with its neighbours under the Duty to Cooperate and in respect of meeting the unmet need of Sevenoaks District – an area with 93% Green Belt. The three Council's in the West Kent Housing Market Area (WKHMA) failed to commission a joint Green Belt Study. Doing so would have enabled the Council's under the DtC to robustly identify, review and consider what options and alternatives there are for development within the region, where the best locations for development were, and to plan effectively to meet the cumulative housing needs of the area.

2.6 Finding this plan unsound, on the basis that it is not supported by robust evidence, has not been positively prepared and is unsound, would provide the opportunity for the three Council's in the WKHMA to work together constructively, particularly given that all three Council's will be at the same plan-making stage – a reason given in this Examination by the

¹⁰ Comprising all of SV Sites AL/RTW5, AL/RTW14, AL/RTW16, SS3, AL/PW1, AL/PE1 to /PE7 and AL/SP1

¹¹ AL/RTW17 and AL/RTW19

Council for why it hasn't assisted its neighbours. If this plan were to proceed, the opportunity for TWBC to work together effectively with its neighbours would be lost. As such, the opportunity for TWBC, which is the least constrained in terms of Green Belt area within the WKHMA, to assist SDC in meeting its unmet need of 1,900 dwellings would be lost. If this plan progresses unchanged, it leaves a significant unmet need within the WKHMA, which is neither positive nor effective planning.

Q4. Can housing needs be met by optimising the use of previously developed land and buildings without requiring land to be released from the Green Belt?

2.7 No. It is clear to us that there is insufficient PDL to meet the development needs of the Borough and that release of Green Belt land is inevitable and entirely necessary.

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

2.8 Notwithstanding the errors in the Stage 3 GB document described above, Figure 4.1 of that document¹² indicates the relationship of the GB boundary to the 3 largest settlements in the Borough (Royal Tunbridge Wells, Paddock Wood and Pembury). While this question is mainly for the Council to answer, it would be at odds with the Framework¹³ to direct residential and economic development away from these settlements to locations which will be less sustainable than these main towns simply to avoid the Green Belt, which is a planning policy tool rather than absolute constraint.

Q6. When drawing up or reviewing Green Belt boundaries, paragraph 142 of the Framework states that the need to promote sustainable patterns of development should be taken into account. How and where has the Council taken this into account?

2.9 This is a question for the Council, though we reserve the right to respond to the Council's answer either orally or in writing if necessary (please also note our comment on Q5).

¹² Core Document [3.141, page 34](#)

¹³ NPPF Paragraph 142

Q7. Having decided to review the Green Belt boundary, how did the Council determine, at a strategic level, where alterations should be made in order to meet housing and employment needs?

2.10 This is not clear. Our Matter 1 Statement on behalf of CESL raised concerns with the lack of a co-ordinated approach to Green Belt (GB) assessment by the three LPAs comprising the West Kent Housing Market Area¹⁴ and raised questions on the Sustainability Assessment. We consider that a holistic review of the Green Belt should have been taken, as has been done in several other sub-regions in the country. We consider it a missed opportunity that the three Council's failed to work together constructively under the duty to cooperate to effectively identify and plan for the needs of each area and importantly the unmet needs of Sevenoaks.

2.11 We add that even within the Green Belt (GB) documentation prepared by TWBC, there is a lack of clarity and consistency as to the approach taken as noted above.

Stage 2 Green Belt Assessment

2.12 It is important to emphasise that The Landscape Institute¹⁵, in their April 2018 briefing document¹⁶ confirm that "Green Belt is a spatial planning tool, *not a designation that provides landscape protection*" (our emphasis). This point was also accepted by the LPA in their verbal evidence at the Stage 1 (Matter 1) session on 2 March 2022 (Day 2, morning)¹⁷.

2.13 Within that overall context, and as an example of the inconsistencies in the Stage 2 GB Assessment¹⁸ by Land Use Consultants (LUC), there are commonalities between all of the PE1¹⁹, PE6²⁰ and TW5²¹ Parcels. All of the parcels are located between parts of settlements and the A21, with PE6 and TW5 facing each other on opposite sides of the A21 (both between the settlement boundaries of Royal Tunbridge Wells and Pembury). They are of comparable depth

¹⁴ Tunbridge Wells Borough Council (TWBC), Sevenoaks District Council (SDC) and Tonbridge and Malling Borough Council (TMBC)

¹⁵ <https://www.landscapeinstitute.org/>

¹⁶ [Green Belt Policy, April 2018, pg5](#)

¹⁷ Day 2, 02 Mar 2022, morning session – [see video of the Examination session](#) (1h 27m 45s). Also See the Tunbridge Wells Borough Green Belt Strategic Study, page 13, paragraph 3.24. (Core Document CD 05.21)

¹⁸ Exam Document [3.93\(b\)](#)

¹⁹ Exam Document [3.93b\(iii\), page 2](#)

²⁰ Exam Document [3.93b\(iii\), page 14](#)

²¹ Exam Document [3.93b\(v\), page 10](#)

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between the settlement boundary and the A21. PE6 is also nearer to Royal Tunbridge Wells than is the case for PE1.

2.14 It is relevant to note that GB parcel TW5 is the location of the CESL Omission Site²²; GB parcel PE6 is the location of proposed allocation AL-PE8²³; while GB parcel PE1 is the location of 4 of the proposed allocations: AL-PE1²⁴; AL-PE2²⁵; AL-PE3²⁶; and AL-PE7²⁷. These allocations are indicated on Submission Inset Map 29 for Pembury²⁸.

2.15 Table 1 below summarises the conclusions of the Stage 2 Assessment for these parcels.

Green Belt Purpose ²⁹	TW5 <i>W of A21, adjacent to Royal Tunbridge Wells</i>	PE6 <i>E of A21, adjacent to Pembury</i>	PE1 <i>N of A21, adjacent to Pembury</i>
A) Check the unrestricted sprawl of large built-up areas	Relatively Weak	Moderate	Relatively Weak
B) Prevent neighbouring towns merging into one another	Relatively Strong	Moderate	Relatively Weak
C) Assist in safeguarding the countryside from encroachment	Moderate	Relatively Weak	Relatively Weak
D) To preserve the special character of historic towns	Relatively Weak	Weak / No Contribution	Relatively Weak

Table 1 - TWBC Stage 2 Assessment

2.16 Insofar as GB Purpose B is concerned³⁰, the Council has previously concluded that in respect of development within Parcel TW5³¹:

- *“Development on this parcel would leave only a very narrow physical gap, but the A21 and A246, and associated tree cover, would preserve a sense of separation”³².*

²² SHELAA Site 114

²³ [Owlsnest Wood](#); 76-bed care home

²⁴ [Land rear of High Street and west of Chalket Lane](#); 50-60 dwellings

²⁵ [Land at Hubbles Farm and south of Hastings Road](#); 80 dwellings

²⁶ [Land north of the A21, south and west of Hastings Road](#); 80 dwellings

²⁷ [Land at Cornford Court](#); 68-suite integrated community healthcare facility

²⁸ Exam Document [3.129o](#)

²⁹ NPPF para 138

³⁰ See Exam Document [3.93b\(j\)](#), Figure 6.2

³¹ [Green Belt Study - Stage 2 - LUC -Appx Aiv RTW- CD3.43b\(v\) & 3.93b\(v\)](#)

³² Under Contribution to Green Belt Purposes - Purpose 2, Comments.

- *“The A21 and its containing tree cover which prevents any intervisibility between the two settlements, is a key element in the settlement separation”³³.*
- *“The parcel is adjacent to the large built-up area and relates more strongly to this than to the wider countryside”³⁴.*

2.17 As such, there is no cogent reason why TW5 has been judged more important than that of its opposing counterpart PE6, particularly given the Council itself conclude that the presence of the A21 and A264 together with tree cover *“preserve a sense of separation”*. The Council’s Stage Two Green Belt methodology, in defining the assessment criteria for ‘Moderate’, includes the criteria that *“Development of this parcel would result in significant narrowing of the physical gap, but landscape feature(s) would preserve a sense of separation”*.³⁵ This is consistent with the description of parcel TW5 under ‘Contribution to Green Belt Purposes - Purpose 2’ Comments (highlighted above). Both these parcels should therefore be “Moderate” for this purpose. We point out that the proposed development on the Omission site accounts for only around a fifth of parcel TW5, limited to its northern extent, and the majority of the parcel to the south of the development and adjoining the A264 would be retained.

2.18 Insofar as GB Purpose C is concerned³⁶, there is no cogent reason why TW5 has been judged as more important than either PE6 or PE1. The Council’s Stage Two Green Belt methodology, in defining the assessment criteria for ‘Relatively Weak, includes the criteria that *“The parcel relates more strongly to the settlement than to the wider countryside”*.³⁷ This matches the description of parcel TW5 under the Purpose 1 comments (highlighted above). All 3 parcels should be “Relatively Weak” due both to their adjacency to settlement and to the presence of the A21 dual carriageway (which acts as a separating feature and creates a permanent edge which acts to protect the countryside beyond).

2.19 The most glaring inconsistency is between GB parcels PE1 and PE6 in relation to GB Purpose D³⁸. PE1 is judged to form *“a minor element in the setting of Tunbridge Wells”* (our emphasis

³³ Under Relationship between settlement and countryside

³⁴ Under Contribution to Green Belt Purposes - Purpose 1, Comments

³⁵ Tunbridge Wells Green Belt Study Stage Two, page 23

³⁶ See Exam Document [3.93b\(j\)](#), Figure 6.3

³⁷ Tunbridge Wells Green Belt Study Stage Two, page 24

³⁸ See Exam Document [3.93b\(j\)](#), Figure 6.4

added) while PE6, which is closer to Tunbridge Wells, “does not form part of the setting of an historic town”. This is illogical.

Green Belt Purpose ³⁹	TW5 <i>W of A21, adjacent to Royal Tunbridge Wells</i>	PE6 <i>E of A21, adjacent to Pembury</i>	PE1 <i>N of A21, adjacent to Pembury</i>
A) Check the unrestricted sprawl of large built-up areas	Relatively Weak	Moderate	Relatively Weak
B) Prevent neighbouring towns merging into one another	Moderate	Moderate	Relatively Weak
C) Assist in safeguarding the countryside from encroachment	Relatively Weak	Relatively Weak	Relatively Weak
D) To preserve the special character of historic towns	Relatively Weak	Relatively Weak	Relatively Weak

Table 2 - CESL Conclusions of Stage 2 Assessment

2.20 In contrast to the Stage 2 Assessment, Table 2 (above) indicates the CESL view of these parcels, and concludes, objectively, that TW5 should at the very least have parity with PE6 after the Stage 2 Assessment. Indeed, given the greater presence of protected trees and ancient woodland in Parcel PE6 (the latter is shown on the plan for PE6⁴⁰), there is all the more reason that the TW5 parcel should be considered more favourably than PE6.

2.21 Thus, the conclusions of Table 6.1 of the Stage 2 GB Assessment⁴¹, as illustrated in Figure 6.5⁴² which suggest an “Overall Harm Rating” for each parcel are unsound and should have been revisited and assessed in more detail, including at Stage 3. The resulting ‘baked-in bias’ against

³⁹ NPPF para 138

⁴⁰ Exam Document [3.93b\(iii\)](#), page 14

⁴¹ Exam Document [3.93b\(i\)](#), page 28

⁴² Exam Document [3.93b\(i\)](#), page 33

TW5 within the Plan is not explained by the Evidence Base documents. The assessment is therefore not robust.

Stage 3 Green Belt Assessment

- 2.22 Compounding the Stage 2 inconsistencies, and in contrast with the approach taken by other authorities⁴³, there is then a procedural error within the Stage 3 GB Assessment⁴⁴. This document only assesses the potential harm of the proposed allocations⁴⁵, and fails to assess the potential harm from omission sites at the same level of detail. Chapter 5 of the Stage 3 Assessment⁴⁶ purports to be some form of assessment of alternatives but is in fact merely written in support of a clearly pre-determined development distribution strategy.
- 2.23 Without a clear and proper assessment of the potential harm arising from the promoted sites that were not taken forward as potential allocations, there can be no confidence in the robustness of the strategy and evidence base, and the conclusions drawn from it cannot be considered to be sound.
- 2.24 It is noteworthy that the TWBC Stage 3 document, prepared by LUC in November 2020, is less comprehensive and less transparent than Dorset’s Stage 2 document, also prepared by LUC, a month later.

⁴³ For example, Dorset Council, which has undertaken a Harm Assessment for all of the sites promoted as potential allocations within Stage 2 of its Green Belt Assessment – see [this webpage](#) and the Appendices to Stage 2

⁴⁴ Exam Document [3.141](#)

⁴⁵ The subtitle to Exam Document [3.141](#) is “Assessment of Green Belt *Allocations*”

⁴⁶ “Assessment of strength of remaining Green Belt”

3.0 Matter 4 Issue 2 – Green Belt Review Methodology

Q1. The Green Belt Study Stage 1⁴⁷ identified 33 parcels and 10 broad areas for assessment at Stage 2. How were these areas defined and what were the boundaries based on?

3.1 It is not clear. We have seen no robust explanation. We reserve the right to respond to the Council's answer either orally or in writing if necessary.

Q2. The Green Belt Study Stage 2⁴⁸ provides a more detailed and focused review of land parcels, assessed against the purposes of including land within the Green Belt in paragraph 138 of the Framework. How did the Council take the findings into account and use the evidence in the preparation of the Plan?

3.2 It is unclear. Our answer to Issue 1, Q7 provides evidence of inconsistencies in the LPA's approach to Green Belt parcels in the Stage 2 GB Assessment. We consider that inadequate scrutiny of the LUC conclusions of the Stage 2 GB Assessment was undertaken by the Council, and that the omissions and inconsistencies undermines the validity of those sites taken forward at Regulation 19 and Regulation 22 Stage. In light of this, the Submission Plan plainly cannot be sound.

3.3 We reserve the right to respond to the Council's answer either orally or in writing if necessary.

Q3. What was the purpose of the Green Belt Study Stage 3⁴⁹? Did it build upon the findings of the earlier studies, or, assess proposed site allocations?

3.4 As is indicated above in our answer to Issue 1, Q7, there are significant flaws to the Stage 3 GB Assessment. Its clear purpose, alone, was to assess the harm likely to result from the release of proposed allocations in the Green Belt. It did not (with 1 erroneous exception⁵⁰) assess the harms likely to arise from other promoted land that has not been included in the SV of the Plan.

⁴⁷ Core Document [3.93a](#)

⁴⁸ Core Document 3.93b(i)-(v)

⁴⁹ Core Document [3.93c](#)

⁵⁰ Site RTW13 in the [Stage 3 Assessment](#) lies to the east of SV Plan allocation AL/RTW17. It is not proposed for allocation in the Plan – See [Inset Map Tunbridge Wells NE](#)

3.5 While the Stage 3 GB Assessment did build on the results of earlier work, the failure to assess harm arising from omission sites means that rather than seeking to consider alternatives in an open-minded manner, it has the effect of simply reinforcing a pre-conceived development strategy. Hence it is ‘baked-in-bias’.

3.6 We reserve the right to respond to the Council’s answer either orally or in writing if necessary.

Q4. Where the release of land from the Green Belt was found to have either high or very high levels of harm, how was this taken into account in the site selection process?

3.7 The conclusions of the Stage 3 Assessment, summarised in Table 4.1⁵¹, include “high” harm for Tudeley Village⁵² and Paddock Wood / Capel and “moderate” harm for 3 other sites⁵³. The fact that most of these harmful sites were then allocated is indicative that the Council accepts that harm to GB is necessary, and acceptable, in order to deliver the quantum of housing needed to 2038. However, a closer examination of the results together with a wider assessment of harms potentially arising from other (omission areas) could have resulted in the Council looking again at other, less harmful, releases of other GB parcels, in whole or in part. Instead, it appears that the results of the Stage 3 GB Assessment were simply seen as a box-ticking exercise, with no cogent thought given to the conclusions.

3.8 It is apparent therefore that site selection process has occurred independently of the Stage 3 GB Assessment and is unsound.

3.9 We reserve the right to respond to the Council’s answer either orally or in writing if necessary.

Q5. How was the potential for mitigation considered in the Green Belt studies? Was this considered on a consistent basis for all sites?

3.10 As is indicated above, the potential for *avoidance* of harm (in the form of selecting less harmful sites), much less mitigation of harm, has not been included in the GB Studies.

⁵¹ See Core Document [CD3.141, pg114](#)

⁵² In contrast to the “Very High” assessment for Tudeley Village at GB Stage 2 – See Exam Document [3.93b\(i\)](#), Figure 6.5, page 33

⁵³ These are AL/RTW12, AL/RTW13 and AL/RTW23 in the Stage 3 Assessment. These are in fact, respectively, allocations AL/RTW17, an unallocated site and AL/RTW19 in the Submission Version of the Plan

3.11 The failure of the Stage 3 GB Assessment to consider harm likely from other, omission, sites means that the answer to the second part of this question is: No.

3.12 We reserve the right to respond to the Council's answer either orally or in writing if necessary.

Q6. Paragraph 144 of the Framework states that if it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

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

3.13 This is for the Council to answer but we have seen no evidence that could amount to a robust assessment.

4.0 Matter 4 Issue 3 – Exceptional Circumstances

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

4.1 Yes. It is clear, given that the current development strategy within the SV of the Plan seeks to allocate approximately 60% of the housing need to Green Belt sites, that exceptional circumstances exist for GB release within TWBC. We consider there is insufficient land outside of the Green Belt in sustainable locations to meet the needs of the Borough.

4.2 However, CESL **disagrees** with the Council that:

- the GB Assessments⁵⁴ (upon which the strategy purports to be based) are sound; and
- sites that are less harmful to the GB are being considered first

4.3 Separately, and linked to our Stage 2 representations to Matter 2 (Housing and Employment Needs), Matter 7 (Residential Allocations), and Matter 8 (Meeting Housing Needs) we consider that needs for specialist housing designed for older people (a) is not understood by the Council, (b) is not being met by the proposed allocations, and (c) requires other sites to be allocated. We consider that further land is needed, including land within the Green Belt to meet these needs and achieve sustainable patterns of growth.

4.4 We reserve the right to respond to the Council's answer either orally or in writing if necessary.

Q2. What is the justification for the new area of Green Belt proposed to the southwest of Paddock Wood? Do the exceptional circumstances exist necessary to justify this alteration to the Green Belt boundary?

4.5 No comment.

⁵⁴ Both the Stage 2 and Stage 3 assessments (Exam documents 3.43b/3.93b and 3.93c/3.141)