

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council**  
**Hearing Statement**

**Matter 15: The Natural  
Environment (Policies EN9,  
EN10, EN12, EN13, EN14, EN20,  
EN21, EN22, EN23, EN24, EN25,  
EN26, EN27 and EN28)**  
**Issue 3: Biomass and Renewable  
Technology**

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# Matter 15 – The Natural Environment (Policies EN9, EN10, EN12, EN13, EN14, EN20, EN21, EN22, EN23, EN24, EN25, EN26, EN27 and EN28)

## Issue 3 – Biomass and Renewable Technology

### Inspector’s Question 1: [re. justification for Policy EN23]

*What is the justification for including a specific policy (EN23) on biomass technology in the Local Plan?*

#### **TWBC response to Question 1**

1. Of note, Policy EN23 Biomass Technology is found on document page 386 of the Submission Local Plan [\[CD 3.128\]](#) and is set against the backdrop of the topic of air quality, rather than one of energy provision.
2. In paragraph 6.258 of the supporting text, the aim of the policy is explained as being to “...improve and maintain good air quality in locations where biomass technology is installed...”
3. This approach is in line with paragraph 186 of the NPPF which looks for planning policies to contribute towards compliance with relevant limit values or national objectives for pollutants, whilst identifying opportunities for improvement.
4. To meet this expectation requires detailed technical information, which is regarded as better dealt with in a separate policy rather than by incorporation into existing policies for air quality (EN21 and EN22).
5. Where respondents raised concerns during consultation that the policy appeared to be promoting biomass technology over other forms of renewable energy generating technology which have lower carbon footprints, the Council has responded in the Consultation Statement [\[CD 3.134b\]](#) by explaining the policy emphasis was on

preventing biomass technology being installed in unsuitable locations in the borough for air quality. The installation of renewable energy-generating technologies is considered elsewhere in the Local Plan by Policy EN 3 Climate Change Mitigation and Adaptation.

6. In terms of the policy expectation that biomass be sourced locally, to minimise transport emissions (as well as potentially support local woodland management), it is noted that there is an anomaly within the policy in that the first paragraph says biomass “*must be locally sourced*”, whereas Point 2 says “*preferably locally sourced*”.
7. For internal consistency, as well as consistency with Policy EN3, which refer to biomass boilers *using locally sourced biomass*, it is proposed that Modification be put forward that the word “*preferably*” be deleted from Point 2.

## **AL/RTW 18 – Former North Farm Landfill Site/North Farm Industrial Estate**

### **Inspector’s Question 2: [re. justification for mix of uses proposed at AL/RTW 18]**

***What are the mix of uses proposed at site AL/RTW18 based on?***

### **TWBC response to Question 2**

#### **Introduction**

8. This site comprises the former landfill site which is adjacent to the Tunbridge Wells Household Refuse and Recycling Centre, as well as other mixed commercial uses. The site consists of a mix of former uses – including a gypsy and traveller site which is now abandoned and overgrown.
9. The former landfill area was designated as Rural Fringe within the Site Allocations Local Plan (SALP) 2016 [[CD 3.119](#)] under Policy AL/GB 4 as a long-term land reserve. The supporting text refers to “*The North Farm Tip will be unable to be developed until after the Plan period as it is a former landfill site and presents environmental constraints that cannot be overcome before 2026*”.
10. Policy AL/RTW 18 – Land at the former North Farm Landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate, allocates land for renewable or sustainable energy, sport, recreation, or leisure uses (including those that fall within sui generis use).

#### **Consideration**

11. The site was considered through the Strategic Housing Land Availability Assessment (SHELAA) [[CD 3.77n](#)] as suitable for allocation within the Local Plan (pages 56-59) and confirmed through the Sustainability Appraisal (SA) [[PS 013](#)]. The conclusions of the SHELAA are that the site is suitable as a potential Local Plan allocation – it is recognised that it is an existing Rural Fringe site that could come forward for sport and recreation uses or renewable energy uses during the plan period.
12. The mix of uses proposed for site AL/RTW 18 are based on stakeholder preferences and the assessment of the site through the SHELAA and the Local Plan formulation process.

13. As referred to at paragraph 5.114 of the Local Plan, it is acknowledged that *'Kent County Council has confirmed that the site is still emitting methane gas and therefore would only be suitable for certain development such as that which it is allocated for; sport, recreation or leisure uses, and renewable or sustainable energy production'*.
14. The Council has considered the uses that could be acceptable and suitable for this site, including sport, recreation or leisure provision (subject to detailed considerations at the time of any application and the condition of the site) which in the Council's view would be acceptable uses for this site in this location.
15. The provision of sport and recreation uses, and in particular informal open space/amenity green space, is covered within the Open Space Study 2018 [[CD 3.88c](#)]. Such spaces are generally accessible to all and can provide a variety of spaces and functions. It is considered that this site, formerly designated as a Rural Fringe, could contribute such informal open space/amenity green space to serve the main urban area, close to existing residential and commercial areas.
16. Kent County Council (KCC) owns the land and, through discussions between the Council and KCC, the Council have been made aware that KCC have identified and are promoting the site for use as a solar farm which it is considered would be in accordance with the intention of Policy AL/RTW 18.
17. The Council have been made aware of the fact that KCC is currently preparing a package of works for soil remediation and the installation of new gas and leachate collection systems at the site. These works are hoped to be completed by the end of 2022, with a planning application for a solar farm expected in 2023. KCC has explained that the solar farm would be dependent on funding and grid connection.
18. Until the work by KCC is progressed and subject to consideration of a proposal for renewable energy generation, the policy reasonably reflects what are considered to be the range of appropriate uses for the land at this point.

## **Inspector's Question 3: [re. developability of AL/RTW 18]**

*Is the allocation developable within the plan period?*

### **TWBC response to Question 3**

19. Yes - either of the proposed uses for the site are developable during the Local Plan period.
20. As noted in response to question 1 above, the remedial works to the site are being undertaken by KCC this year. Once this work is complete, the normal timings for pre-application advice followed by planning application approval applies.
21. On average, based on previous experience, a solar farm can be constructed in a matter of months ([BRE, 2014](#)).