

**To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?**

2.6 Summary of findings

**Which part of the plan does your comment relate?**

Policy

**What is the reference number?**

STR/SS 1

**Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:**

Yes No

**Legally Compliant** Selected Not Selected

**Sound** Not Selected Selected

**Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.**

The National Planning Policy Framework (NPPF - Dec 2023) states that Green Belt should only be released for developments under exceptional circumstances. It also stated that before concluding that exceptional circumstances exist, brownfield sites and underutilised land should be made use of.

Despite this TWBC initially proposed that the 2 strategic sites (the expansion of Paddock Wood - Policy STR/SS1 and the creation of Tudeley village – Policy STR/SS3) for the Borough should be developed on Green Belt. The Inspector identified that the magnitude of harm from the two largest allocations of Green Belt is “high” and recommended in his Initial Findings that TWBC should perform an assessment of alternative sites that could be considered for development. TWBC carried out this assessment but only included alternative sites that lie within Green Belt despite there being several sites of significant size within TWBC which are not situated in Green Belt or AONB. These include Site Reference: 144, Horsmonden and Site Reference: DPC3 Blantyre House (both sites totalling approx. 130 hectares) which were proposed and assessed within the SHELAA but were been rejected for development. Both sites are outside of Green Belt and AONB and therefore should be utilised for housing before releasing sites from Green Belt for the expansion of Paddock Wood (Policy STR/SS1).

### **Blantyre House**

Blantyre House prison and the surrounding land are owned by the government. The SHELAA only assessed Blantyre House prison buildings and its immediate surrounding land which is 11.40 hectares. The complete government owned site is approximately 79 hectares. This site was considered as reasonable alternative site for development but was rejected as it was thought to be too small, if the complete site had been considered this fact would not stand. In addition the

Goudhurst Neighbourhood plan supported the development of the site. The site is 3 miles from Cranbrook, 3.8 miles. Cranbrook is a small town in TWBC with 2 secondary schools, shops and various other facilities. The nearest rail station is 3.8 miles from the site with links to London and Ashford International. The site has an existing road system connecting it to both Cranbrook and the nearest rail station. There is currently an existing bus service that could serve this development. If this site were to be developed it would be utilising brownfield and derelict buildings and no Green Belt would be destroyed to either build houses or to better the existing road structure.

### **Horsmonden**

Site ref: 144, Horsmonden , approx. 50 hectares (622 – 1,243 houses) was proposed for development and despite not being in Green Belt or ANOB, this site was rejected for development for the following reason: ‘This would be a very large scale strategic allocation that would be disproportionate to the size of the settlement with concern about the landscape and heritage’. The rationale behind this statement is not valid for a number of reasons; 1) The sites in East Capel that are planned for development for the Paddock Wood expansion are not only in Green Belt but are adjacent to listed buildings and are adjacent to existing Limits to Built Development plus have general background archaeological potential. In addition site 312 contains Ancient Woodland, an AONB component part and Historic Route ways Roads. 2) Site ref:144 is attached to the Horsmonden therefore is an extension of an existing conurbation, therefore its development would not cause neighbouring towns merging into one another. 3) Site 144, will not be destroying additional Green Belt to create transport links as it will be able to utilise the existing road structure that serves Horsmonden.

**Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The local plan should be changed in order that it is compliant with the NPPF with regard to the use of Green Belt for development. The NPPF states, brownfield sites and underutilised sites should be used for development before releasing land from Greenbelt therefore the 2 following sites that are both outside of Greenbelt; Site Reference: 144, Horsmonden and Site Reference: DPC3 Blantyre House (both sites totalling approx. 130 hectares), should both be included in the local plan for development.

**Please use this box for any other comments you wish to make.**

Paddock Wood and the surrounding land are prone to flooding which will not be helped by the building of more houses and creating hard surfaces. Because a number of the proposed sites for the Paddock Wood extension are within flood zone 2 and 3, the Inspector recommended TWBC considered alternative low flood risk sites and both Site a 144 Horsmonden and Blantyre House are not in a flood zone. The Inspector also recommended that the sites that are in flood zones 2 and 3 should not be utilised for housing for the Paddock Wood extension. TWBC response to this recommendation was to decrease the number of houses built but not reduce the amount of land released from Green Belt. The main purposes of Green Belt include: ‘To prevent neighbouring towns merging into one another’ and ‘To assist in safeguarding the countryside from encroachment’. By not

limiting the amount land released from Green Belt will result in an increase in the urban sprawl there by eliminating the distinct boundary of Paddock Wood with its neighbouring conurbation. Furthermore, once land has been released from Green Belt, it cannot be returned and therefore its ability to safeguard the countryside is lost, even if the initial purpose for the release is not for housing but for the development of a wetland park and green spaces. The removal of Green Belt designation means the land loses its protective function for the countryside and in the future the wetland park and green spaces could easily be utilised for housing development.

**If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?**

No, I do not wish to participate at the examination hearings