

TLAG – response to MIQs (6 September 2019)

Matter 4 – Green Belt boundary alterations

MIQ number	Question	Cross reference to TLAG representations	TLAG response
Q4.2	<i>In terms of paragraph 84 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?</i>	Para 4.22 / 4.65	<p>Although the Local Plan does not propose to modify the Green Belt boundary at South Godstone at this stage (deferring this to a future AAP as we cover further in response to Q4.5), significant deletions to the Green Belt would be required in order to accommodate the scale of development proposed during the plan period (and substantially more to accommodate the total 4,000 units ultimately aspired to).</p> <p>As set out in detail in our regulation 19 representations, and in our response to the questions in Matter 3, TLAG do not consider that the spatial strategy promotes sustainable patterns of development. In summary, development should be first located within existing urban areas (i.e. in accordance with TDC’s discounted Approach 2). If modifications to the Green Belt boundary are required the most appropriate locations are clearly on the edge of existing main settlements, in the closest proximity to existing services and transport infrastructure, and not in a highly unsustainable location such as South Godstone</p>
Q4.3	<i>Have all realistic alternatives to releasing land from the Green Belt been considered, such as further development in the urban area or increasing development densities, and would the most efficient use of land proposed for release from the Green Belt be made?</i>	Para 4.22	<p>The analysis set out in our regulation 19 representations and in response to Q3.1 demonstrates that TDC have not adequately considered (or have rejected) options which would either avoid the need for Green Belt release or would focus Green Belt release around the edge of Tier 1 and Tier 2 settlements.</p> <p>We will not repeat these arguments here, other than summarise that:</p> <ul style="list-style-type: none"> - Insufficient housing is directed towards the Tier 1 and 2 settlements. Based on the current strategy only 282 dwellings would be delivered in these locations in the period from 2026 to 2033 (compared to the proposed 1,400 at South Godstone in that period); - A number of sites that <i>are</i> allocated promote low density development which does not accord with TDC’s own policy on making the best use of land, or the compulsion on TDC to maximise densities before restoring to Green Belt release. Indeed, the council, as referenced in our Reg 19 rep’s, specifically decided not to optimise densities in defiance of the housing White Paper and the new NPPF

			<ul style="list-style-type: none"> - As summarised in response to Q1.1 there is no evidence of any serious attempt to negotiate with other authorities on their ability to meet unmet need.
Q4.5	<i>In overall terms, are there exceptional circumstances for the proposed alterations of the boundaries of the Green Belt, to accommodate the level development proposed?</i>	Para 4.65	<p>As addressed in our regulation 19 representations and again in response to Q2.16, a fundamental flaw in the approach to identifying the broad area of search at South Godstone is that the consideration of whether exceptional circumstances exist for releasing Green Belt land is proposed to be deferred to an AAP. We will not repeat these arguments in full here, but it is simply not acceptable to defer an assessment that is so crucial to the suitability or otherwise of land currently designated as Green Belt for housing use, to a later date. And particularly not where it forms such a major part of TDC’s strategy for future housing growth (almost 40% of the remaining proposed housing supply over the plan period after taking into account existing commitments) and involves Green Belt land that is acknowledged to be performing its function.</p> <p>We provided an analysis of whether exceptional circumstances would exist for the release of swathes of Green Belt land at South Godstone at paragraphs 4.40 – 4.67 of our Reg 19 representations. In summary, (having regard to the tests of the new NPPF which would be applicable for the examination of any future APP):</p> <ul style="list-style-type: none"> a) The spatial strategy does not make the most possible use of brownfield and underused land; b) The spatial strategy does not optimise density, including the promotion of a ‘significant uplift’ in densities in town centres; and c) The spatial strategy has not been informed by robust discussions with neighbouring authorities to determine if they could accommodate some of the need (which we address further in response to Q1.1. <p>In such circumstances an approach which seeks to identify a broad area of Green Belt release simply cannot be justified.</p>