



Tunbridge Wells Borough Council Tunbridge Wells Stage 3 Local Plan Examination

Hearing Statement

Matter 1 – Green Belt Assessment, Sustainability Appraisal and Local Plan
Review

On behalf of **Obsidian Strategic**



OBSIDIAN
STRATEGIC

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For and on behalf of Stantec UK Limited				

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1 Introduction

1.1 Background

- 1.1.1 We act on behalf of Obsidian Strategic Limited ('our Client'). Our Client is a key stakeholder and promotor of land at Hubbles Farm and south of Hastings Road, Pembury ('the Site') for residential development.
- 1.1.2 The Site is allocated within the Submission Local Plan (2021) through Policy AL/PE2 for residential development of approximately 80 dwellings and an extension of the Pembury Cemetery. The allocation is retained with no changes proposed following the published Inspector's Initial Findings and subsequent consultation on the Council's additional evidence documents.
- 1.1.3 Our Client is currently preparing an outline application for development of the Site, with submission expected later in 2024.

1.2 Site and Policy Context

- 1.2.1 The Site forms a proposed site allocation under Policy AL/PE2. The Site currently lies immediately outside the 'Limits to Built Development' (LBD) boundary of Pembury and within the Metropolitan Green Belt, High Weald AONB and Pembury/Capel Forested Plateau Landscape Character Area. However, it is a relatively contained site with the A21 to the south providing a clear and defensible boundary.
- 1.2.2 The Site is one of three proposed housing allocation sites (AL/PE1, AL/PE2 and AL/PE3) located to the south of the existing settlement edge along Hastings Road. As part of the allocation through Policies AL/PE1 – AL/PE3, all three sites are proposed to be removed from the Metropolitan Green Belt and the LBD boundary will be extended to bound the A21 Pembury Bypass and include the proposed new residential developments.

2 Matter 1 Issue 1 – Green Belt Study Stage 3 Addendum

2.1 Q1: Does the Stage 3 Addendum adequately address those concerns raised in the Inspector’s Initial Findings that sites had not been considered on a consistent basis where harm to the Green Belt is confirmed?

2.1.1 Our Client generally supports the Green Belt Stage 3 Study Addendum which assesses all reasonable alternative sites within or partly within the Green Belt to allow a comparison with the allocated sites, and its conclusion that the original findings of the Green Belt Study remain the same.

2.1.2 The allocated sites within the Submission Local Plan are considered most suitable and with the least harm to the Green Belt. Within the Green Belt Study site allocation Policy AL/PE2 has been identified as performing ‘relatively weakly’ in meeting the purposes of the Green Belt and the level of harm resulting from its release from the Green Belt is ‘low’, with the A21 representing a stronger boundary for the Green Belt compared to the existing settlement edge.

2.1.3 Overall, the Green Belt Study and Addendum demonstrate a logical and transparent justification as to the release of allocated sites from the Green Belt in order to meet identified housing needs, while protecting most valuable Green Belt land and reinforcing boundaries, using physical features that are readily recognisable and likely to be permanent.

2.2 Q3: How did the Council use the information from the Stage 3 Addendum to determine whether or not exceptional circumstances exist to alter the Green Belt boundary as proposed by the submission version Local Plan?

2.2.1 Our Client supports the Council’s conclusion that there are exceptional circumstances to review the Green Belt boundary.

2.2.2 Paragraph 147 and 148 of the NPPF state that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account and ensuring consistency with the development plan strategy to meet identified requirements for sustainable development. Without Green Belt release, the Council will struggle to meet its housing requirements in full and its strategy would be disconnected from its main settlements and be overall, less sustainable. The limited release of Green Belt land to enable housing delivery on appropriate and sustainable sites which are assessed to have a low harm to the Green Belt,

including proposed site allocation AL/PE2 Land at Hubbles Farm and south of Hastings Road, Pembury is a sound approach.

- 2.2.3 Paragraph 148 of the NPPF states that when defining Green Belt boundaries, boundaries should be defined clearly using physical features that are readily recognisable and likely to be permanent. The A21 Pembury Bypass is considered a more recognisable and durable boundary than the existing settlement edge and rear gardens of existing residential properties.