

## **Examination of the Tunbridge Wells Borough Local Plan – Stage 2 - May to July 2022**

Hearing Statement by **Mr PETER AVGHERINOS** on **Matter 3** of the Inspector's "Matters, Issues and Questions for Stage 2 – Revised".

I have made earlier representations in the Local Plan consultation process at Stages 18 and 19, including expressing concerns about the proposed management of the Green Belt.

### **Matter 3 – Spatial Strategy, etc.**

#### **Issue 1 - Spatial Strategy**

##### *Questions 1-3.*

The purpose and value of "The Settlement Role and Function Study Update" (core doc. 3.133) is very unclear. The document is essentially an inventory of infrastructure available in the Borough's settlements, which are scored to create a hierarchy for development. However, the study itself states:

"There are, however, many other factors to be taken into account when allocating land in the rural areas and settlements of the borough, such as housing need, employment/economic factors, transport and infrastructure provision, landscape, historic and environmental considerations and flooding issues."

For many householders, issues of air-quality, noise, space, community, neighbours, security, etc, will all be major factors. The inference that the higher ranking, larger settlements are inherently more sustainable for all than the smaller lower ranked settlements is not valid. Each step in the hierarchy has its place.

##### *Question 6.*

The Inspector draws attention to Royal Tunbridge Wells being surrounded by areas of AONB, except to the north and west, and asks about the development options at these locations.

The part of this non-AONB area to the west is largely designated as Green Belt and serves to maintain separation of the traditional settlements of Royal Tunbridge Wells and Southborough.

Vehicular access into the area is constrained, and likely to remain so. This area is relatively free of air-pollution, providing mitigation to the severe pollution levels along the A26 corridor.

A primary function of Green Belt is to prevent the merger of settlements, and Green Belt performing that function cannot be equated with general Green Belt land elsewhere. This applies to the Green Belt land west of Royal Tunbridge Wells.

There are strong reasons to discount this land for development.

If this land remains predominantly undeveloped, it could become a valuable recreational space for the Metropolitan area of the Borough. Although Tunbridge Wells has historically been well served for open space, recent growth and the forthcoming program of infilling and property conversion to domestic use will increase the density of occupation in Royal Tunbridge Wells. A country park, or similar, might be created at this location with great health and environmental benefits.

### Issue 3 - Limits to Built Development

#### *Question 3*

Land is proposed to be released from the Green Belt at some sites on the basis that the old Green Belt boundary was inadequate, and that stronger more appropriate boundaries can be created, using landscape buffers, open space and outdoor areas within the site. The new GB boundary would divide the reduced Green Belt land on one side from the land released for development on the other. The part of the site allocation occupied by the landscape buffer and related open space remains within the Green Belt. The protection to the boundary zone afforded by its remaining as Green Belt is integral to the approval of altered Green Belt boundaries as made in the PSLP, to be in accordance with Green Belt Study Stage 3.

The land in the adjacent developable portion of the site allocation is removed from the Green Belt and placed in the Limit to Built Development zone.

Could TWBC's planners please confirm that that is the case, and comment on the maintenance responsibility and ownership of the protected part of the site allocation that will not be removed from the Green Belt by the Plan.

#### *Question 4*

If my assessment above is confirmed by TWBC, then any future planning application stage will only concern the developable land within the Limit to Built Development zone. To change the developable area would require a revision to the Plan.

### Issue 4 - Management of Development in the Green Belt

#### *Question 2*

In my opinion, Policy STR9 has not ensured that National Planning Policy has been consistently adhered to in selection of the allocated sites of the plan. I expect this will be addressed at many of the hearing sessions dealing with individual sites. However, the discussion time available at those sessions will be very limited. I would therefore like to make some general points here.

The possibility (likelihood) of a housing surplus was raised at the meeting of Full Council on 3<sup>rd</sup> February 2021 ahead of the vote that adopted the PSLP. Opposition to inclusion of several sites was also expressed. However, the Councillors were assured that all the allocations in the Plan were essential to meet TWBC's own statutory housing need, and that there would be anarchy without an approved plan. The meeting adopted the Plan on that basis.

It has now been stated at the Stage 1 Examination that the submitted TWBC Plan may produce a housing surplus in the Borough. The possibility now exists that Boroughs who were more clinical in allocating sites, even to the point of refusing to meet their needs, may now benefit at the cost of unsuitable developments going ahead in Tunbridge Wells. That is not good management.

Further examples of poor management are:

The approvals to release some Green Belt sites have turned on the assessments of the relative strengths of their current and proposed boundaries. These assessments can be contrived to achieve desired ends. An open rustic fence-line, typical of rural boundaries and directed by the planning authority, can be described as weak despite it being attractive, well-coming and having served well to protect the boundary for many years; while a newly planted partially wooded/open space boundary may be said to be a strong,

even though it can simply be replicated further along, when further incursion into the Green Belt is sought by Developers.

Where a narrowing wedge of land separates two townships, there should be a very strong presumption in favour of maintaining the established boundary rather than retreating to a new boundary under pressure from developers advocating progressive erosion of the Green Belt.

The TWBC decision to release their full potential housing need of Green Belt land for the whole 15 years of the Plan period, including a substantial contingency, in one strike at the start of the Plan is very poor management of the Green Belt. The Local Plan is subject to 5-yearly revisions allowing adequate scope to stage Green Belt releases according to need, provided suitable sites have been identified. Other boroughs are adopting such pragmatic approaches, including identifying sites as “Broad locations for growth”. With reviews of the Plan to be carried out every five years, these identified future development areas can then be upgraded to allocated sites when and if that actually proves necessary; meanwhile the Green Belt remains protected.