

HEARING STATEMENT ON MATTER 3

On behalf of Mr David Munns (Comment ID PSLP_581)

15 March 2022

Introduction

This Hearing Statement has been prepared on behalf of Mr David Munns in response to Matter 3. Mr Munns is the landowner of Grosvenor Garage Mitsubishi 123 - 125 St James' Road ('the Site') which is within the Limits to Built Development (LBD) in Tunbridge Wells. The site location plan identifying the Site is attached at **Appendix 1**.

The Site will become available for redevelopment in August 2022, as the car showroom business is winding down to a closure following the withdrawal of Mitsubishi Motors from selling new vehicles in Europe in September 2021. The Site is currently being marketed. As such, our previous representations to the Regulation 19 consultation were made to ensure that the Site's redevelopment opportunity is identified in the emerging Local Plan. The previous representations are included in the schedule of representations (Core Document 3.125) under Comment ID PSLP_581.

This Statement responds to Question 8 of Issue 1 - Could housing needs be met in a way that did not require land to be removed from the Green Belt and/or require development in the AONB?

Matter 3 Issue 1 Q8

The Site is assessed in the Strategic Housing and Economic Land Availability Assessment - Addendum (October 2021) (Core Document 3.131) under Site reference PSPC_1. It considers that the Site is a sustainable site as it is a previously development land (PDL) site that falls inside the LBD of Royal Tunbridge Wells. However, it was considered unsuitable for residential development as the Council considers it to be a "valued existing economic use". Nonetheless, it notes that this does not necessarily preclude future redevelopment if the tests in Policy ED2 are met in the future.

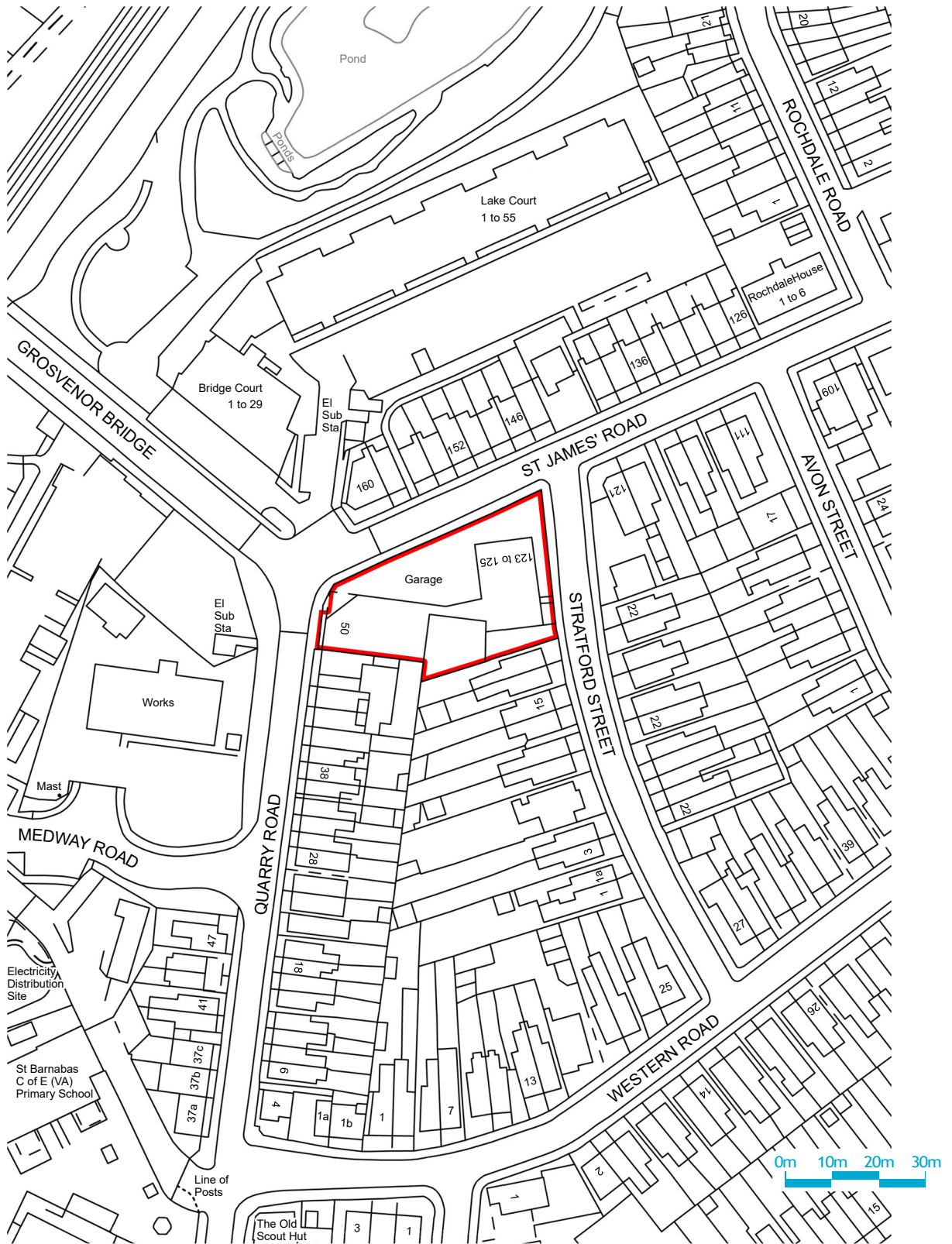
We do not agree with the Council's assessment as the existing car dealership (Sui Generis) is closing down due to the Site becoming surplus to the operator's requirement. Fundamentally, the Site is not considered to be well located as viable employment land or a viable employment site attractive to the employment market, as it is located in a residential area, without a cluster of commercial activities. Therefore, the Site should not be protected as employment land, which is an unnecessarily barrier to redevelopment coming forward without delay. As demonstrated in our previous representations, the Site is available and suitable for housing development and is achievable with a realistic prospect that housing development is delivered within the first five years of the Plan period. The Site is a deliverable housing site in PDL and its contribution to meeting the housing needs should be secured through an allocation in the Local Plan.

The National Planning Policy Framework requires that the Local Plan should be justified with an appropriate strategy taking into account the reasonable alternatives. It is considered that the Local Plan is unsound on the basis that the Site's allocation for housing development as a reasonable alternative to releasing less sustainable Green Belt and AONB sites to meet the housing needs is not taken into account.

For the soundness of the Plan, the Local Plan should be positively prepared to meet the housing requirements through of the allocation of the Site as a sustainable deliverable housing site in the LBD in Royal Tunbridge Wells.

Appendix 1

SITE LOCATION PLAN



SITE LOCATION PLAN
 123-125 St James' Road
 TUNBRIDGE WELLS
 TN1 2HG



Scale @ A4 : 1:1250
 Plan No. : SJR-TW_SLP01



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