

From: Mr. Tom Adam QC

Dear Ms St John Howe,

I have read the "Green Belt Exceptional Circumstances Topic Paper" and would like to comment on paragraph 2.3.17, which relates to the aspect of the Tonbridge & Malling Local Plan in which I am particularly interested (proposed designation of land at Little Postern as "Employment Land"). I am a resident of Postern Lane and am one of the group of residents who have lodged an objection to this proposed designation already.

Para 2.3.17 says as follows: *"Potential Harm to the Green Belt and Minimising Impacts - In terms of potential harm to the Green Belt, the removal of this site could erode the performance of parcel TO5 in respect of the purposes of checking unrestricted sprawl and assisting in safeguarding countryside from encroachment. This could result in moderate harm to the Green Belt and its openness at this location. However, this harm will be reduced by the fact that a significant proportion of the site is conterminous with the urban area of Tonbridge to the west. In terms of minimising wider impacts on the local environment, development would be required to comply with Policy LP14 'Achieving High Quality Sustainable Design' in the submitted Local Plan."*

The highlighted words, which are the only part of the Paper seeking to justify the destruction of 25 acres of the Green Belt at Little Postern, seem to me to be significantly flawed.

- Essentially, this says that (a) because this is a piece of Green Belt land adjoining land which has already been built on, then (b) it doesn't really matter if it is built on as well. The harm in building on it is "reduced", so the argument runs, by the fact that it adjoins built-up land. This is, if I may say so, obviously wrong.

- o The whole point of the Green Belt is to **prevent** the constant expansion of built up areas: its stated purpose is *"to check the unrestricted sprawl of large built-up areas"* and *"to assist in safeguarding the countryside from encroachment"*.

- o But if the logic of para 2.3.17 is applied, then built-up areas within the Green Belt will always be allowed to sprawl, because

they will always have boundaries onto the Green Belt. Those areas of the Green Belt will thus always be "*coterminous with an existing urban area*". If that simple fact is enough to constitute "Exceptional Circumstances", then the Green Belt is an illusion.

o In fact, the Little Postern site being "*coterminous with an existing urban area*" makes it exactly the type of Green Belt area which should be protected as a priority. Building on the land which is "*coterminous with an existing urban area*" is surely the precise definition of urban sprawl. So being "*coterminous with an existing urban area*" does not reduce the harm: it amplifies it, because once one orchard or field falls to development then the case for developing expanding the next one (and the next one, and the next one) becomes stronger.

· Anyway, the factual assertions made in paragraph 2.3.17 are unsound.

o The bland statement that this development "could result in moderate harm to the Green Belt and its openness at this location" is significantly understated. Tearing up an orchard and concreting over a meadow, which is what is involved, will (not "could") result in the destruction of (not "moderate harm to") the Green Belt and its openness. The Council really needs to be frank about what it is doing and the consequences.

o Finally, although it is true, if one simply looks at it on a map, that this land is "*coterminous with an existing urban area*", this is a desk-based assessment and seeing it on the ground tells a very different story. I would urge the Inspectors to make a site visit. If they do so, they will see that the particular topography of the site (especially its contours, because this is a hilltop site) means that this land represents a very significant barrier between Tonbridge and the surrounding countryside. If it is designated for industrial use, the urban sprawl of Tonbridge will suddenly intrude into the countryside in dramatic fashion.

Yours sincerely,

Tom Adam

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