1. Introduction

1. This hearing statement submitted by Impact Planning Services Limited on behalf of Knightwood Trust Farms Ltd (KTF), develops the case made at the submission plan (Regulation 19) stage in light of the Inspector’s questions on this matter and issue. The representation reference is 1185198.

2. Questions 4.1 to 4.6 are the most relevant to the submission on this issue made by KTF.

2. Statement

**Issue:** Is the Green Belt Assessment consistent with national planning policy for Green Belts, is it based upon appropriate criteria and is it adequate and robust?

3. The first question on this issue is **4.1 Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts? Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?** The response to this **yes** so far as the quantum of housing envisaged within the Local Plan is concerned. Further Green Belt review will be necessary and this should be based on the TDC Green Belt assessment reports however it should also identify safeguarded land as required in paragraph 85 bullet points 4 and 5 of the Framework.

4. **Question 4.2 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?** Again, the answer is **yes**, but only so far as the Plan goes at the moment. The capacity for the urban areas has been fully explored.

5. As with the previous question the answer to **question 4.3 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?** Is **yes**. The Urban Capacity Study and the appendices (SBC2 and SBC3 to SBC7) provide a rigorous assessment of the main built up areas in the District and this has been taken forward with the sites proposed in the Plan.

6. **Question 4.4 Is the site selection methodology for sites to be released from the Green Belt robust and are the proposed alterations to the Green Belt boundaries justified?** Yes, the
methodology is robust but more clarity is required regarding the proposed changes to the Green Belt boundary. In the case of the Garden Community, it is clear that the detailed change to Green Belt boundaries will be decided through the AAP. It is suggested that some of the area of search will not be developed within the Plan period. Therefore, the Plan should state that this Green Belt review is to last longer than the Plan period. Should a wider area of search be agreed, then the need for more safeguarded land will become apparent. At the end of the following sentence in TLP03 Green Belt: ‘...through the preparation of an Area Action Plan.’ The following should be added: ‘To accord with the NPPF the Green Belt review should identify areas of ‘safeguarded land’ in order to meet longer-term development needs stretching well beyond the plan period’. This is to accommodate the strategic development of the Garden Community, the fact that this development will continue beyond the Plan period and to ensure that the new Green Belt boundary endures beyond the Plan period.

7. **Question 4.5 In overall terms, are there exceptional circumstances for the proposed alterations of the boundaries of the Green Belt, to accommodate the level development proposed?** The answer is *yes*. Please note the other responses by KTF which cover this question.

8. The last question on this issue: **question 4.6 In overall terms, are the proposed boundaries of the Green Belt defined clearly and would they be likely to be permanent or capable of enduring beyond the plan period?** The answer is *no* for the reasons set out above. Specifically, the answer to question 4.4 applies here as well.