



Our third Public Meeting was a roaring success! Discovery and debate abounded with excellent speakers and a wide range of thought provoking questions. All of the main points of the meeting are in the pages of this newsletter. We were delighted that almost 300 people attended and we are very grateful to The Schools at Somerhill for providing a space in our Parish to meet.



Thank you to our speakers and panellists:

Stephen Baughen, Head of Planning,
Tunbridge Wells Borough Council

Richard Knox-Johnston, Chair of the
London Green Belt Council

John Wotton, Kent Chair of the
Campaign to Protect Rural England

William Benson, Chief Exec, TWBC



“Don’t Give Up!”

“Respond!”



Since we last met...

The meeting began with a quick recap of our progress since our last public meeting at the end of July. The TWBC Cabinet Advisory Board and Cabinet meetings left us disappointed and frustrated. **TWBC Councillors on the Planning Policy Working Group, Cabinet Advisory Board and Cabinet are making decisions that could cause terrible harm to Capel.** They have chosen what is included and omitted in the Local Plan. They are accountable for the content of the plan and its success or failure. They also have a Duty to Co-operate with Tonbridge & Malling, Wealden and Maidstone Borough Councils. We observed indifference, disdain, untruths and a distinct lack of fairness in these meetings and the conduct of Councillors after the meetings.

This could easily have left us feeling as if the Local Plan is a “done deal”... that “the houses have to go somewhere”... and we would be ignored. Oh no. Capel has courage. The meetings only served to stiffen our resolve. A stance borne out of anger but certainly supported by the information you will see from the London Green Belt Council and Campaign to Protect Rural England later on in this newsletter.

Save Capel exists to make sure our voice is heard. The best way to do that right now is to:

- Gather as much information and evidence as we can.
- Look at the proposals in detail and identify actions, omissions and errors.
- Describe issues and concerns clearly and in the correct place and format.
- Submit comments during the upcoming Public Consultation highlighting every issue, big or small; 40 days to go until consultation ends!

We will help you if you feel confused, upset or need help filling in the response forms. It is vital that we all have our say. Please attend the TWBC exhibitions and talk to the planning officers. Details are on the Local Plan [website](#). We also have two Tudeley drop-ins at Goldsmid Hall on Tuesday 24th September and Friday 27th September 10am to 11.30am, where you can look at maps, information and response forms and chat to the Save Capel team and TWBC's Head of Planning. Babies and toddlers are welcome and there will be refreshments.

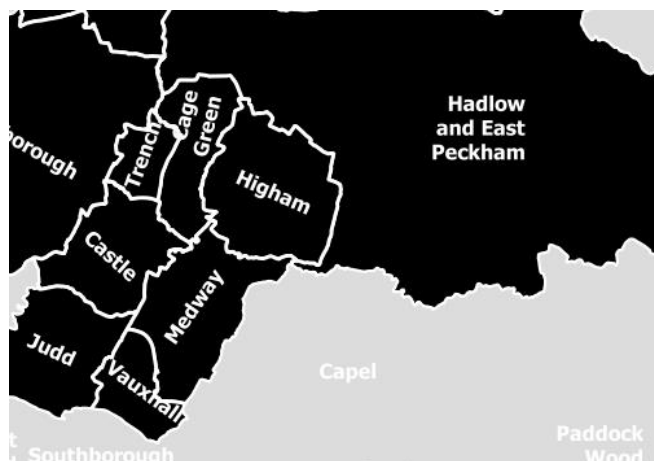
Please watch our [video](#) at [savecapel.com](https://www.savecapel.com) and let us know if you would like an information drop-in at your village (one is being planned for Golden Green) or a visit from Save Capel to your club or community. We are here to help.

Message from our Members of Parliament

Capel's MP, Greg Clark, sent a message to Save Capel to relay to our audience. Mr Clark would like all residents to participate in the consultation to provide evidence of how the draft Local Plan will affect them. He would like Save Capel and other residents to copy their submissions to him, so that he can then draw on the evidence of his constituents in formulating his own detailed advice to the Council as they review the draft Local Plan in the light of the consultation. Mr Clark would like to meet a group from Save Capel towards the end of the consultation period, to make sure that he has fully understood and reflected the evidence that has been submitted.



Capel is much closer to Tonbridge than Tunbridge Wells. Our closest neighbour's MP, Tom Tugendhat, sent us a message that was kindly relayed by Matt Boughten, who is the TMBC Councillor for Medway Ward. The map below shows how close Capel is to Medway Ward and to Hadlow and East Peckham. We were delighted to see so many supporters from these areas at the meeting. Mr Tugendhat's message to us is summed up in one word. **Respond**. He would like everyone to send their comments to TWBC during the public consultation, highlighting every issue that might affect them if this plan goes ahead. **There will be a special meeting of the Tonbridge & Malling Planning & Transportation Cabinet Advisory Board on Wednesday 2nd October at 7.30pm in the TMBC offices at Kings Hill.** Please do attend. We will be able to hear more about the terrible infrastructure issues that Tonbridge will face if a new town is built at Tudeley. TMBC have called the meeting to help formulate their response to TWBC as part of their "Duty to Co-operate". The way in which Local Plans are created and negotiated across borough boundaries is not simple, often with different timescales and policies at play, but it is an essential part of the creation and ultimate adoption of a Local Plan.



The Secretary of State for Housing will look at how regions have planned their housing across several boroughs in the South East. You'll hear more about some of the conclusions from these reviews with regard to the West Country. Planning Inspectors are certainly scrutinising garden settlements closely.

Public Consultation and Masterplanning

Stephen Baughen, Head of Planning at TWBC, kicked off the evenings's presentations with an overview of the public consultation process and masterplanning. There is a huge amount of information on the TWBC [website](#). Understanding the Local Plan and the decisions made during its construction involves reading a range of documents (shown in the slide below). Comments on the Local Plan and Sustainability Appraisal can be made via the TWBC online portal, which guides you to comment on each aspect of the plan/appraisal. Letters can be sent in but the preferred response method is online, as letters need to be read by planning officers and each comment noted against the relevant part of the Local Plan or Sustainability Appraisal.



Documents

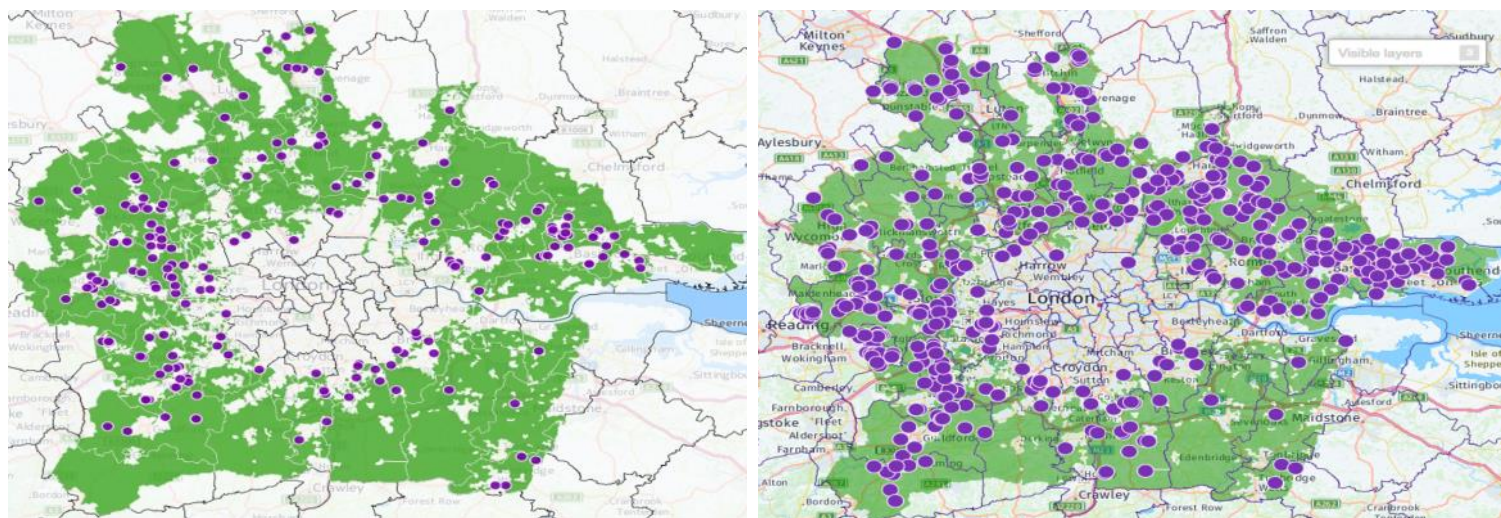
- 1. Draft Local Plan and Policies Maps**
- 2. Sustainability Appraisal**
- 3. Supporting documents:** Infrastructure Delivery Plan, Equalities Impact Assessment, Strategic Housing Land Availability Assessment (SHELAA), Consultation Statement, Green Infrastructure Framework
- 4. Topic Papers:** Housing Needs Assessment; Housing Supply and Trajectory, Distribution of Development; Energy, Residential Parking Standards, Limits to Built Development
- 5. Evidence base:** extensive, but includes Transport Assessment Review and Level 1 and 2 Strategic Flood Risk Assessments

Threat to The Tunbridge Wells Green Belt

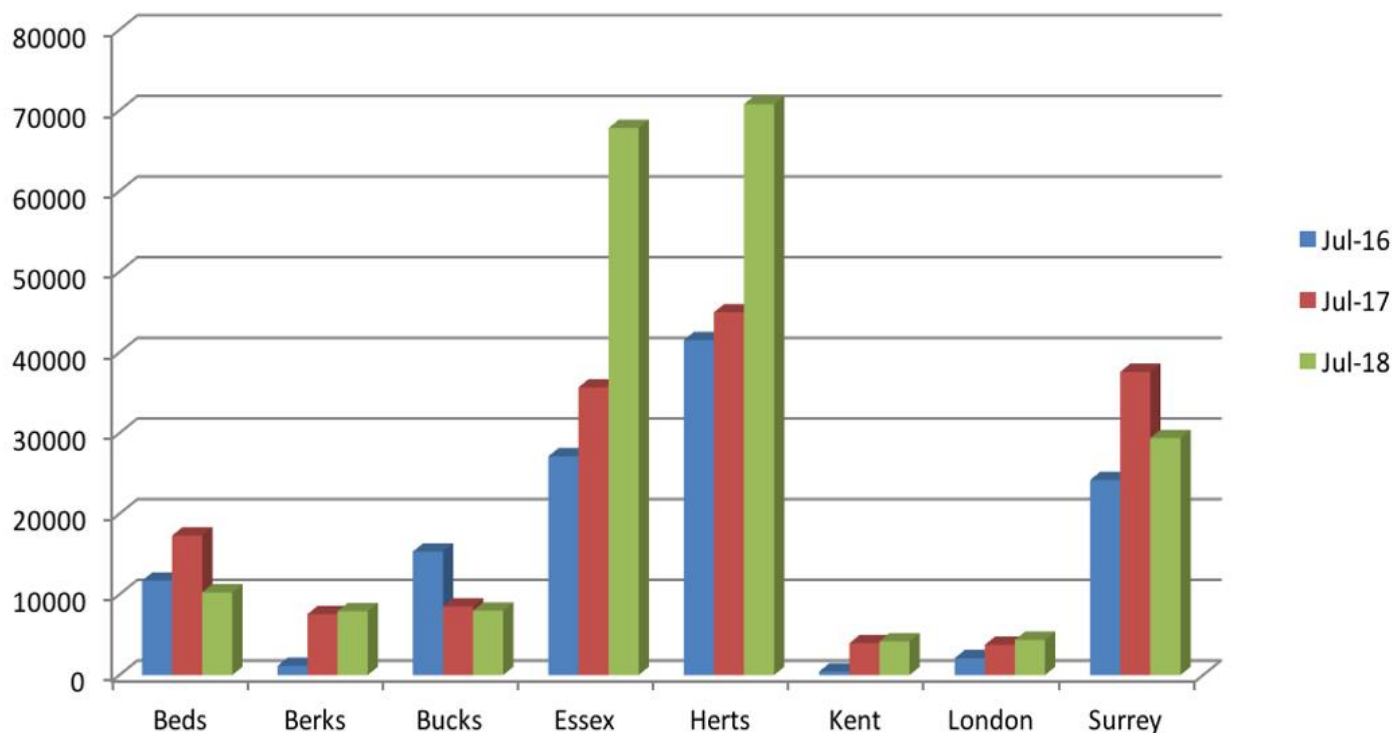
Richard Knox-Johnston is the Chair of the London Green Belt Council. His presentation really chimed with our audience, with gasps of horror at the destruction of the Metropolitan Green Belt and rounds of applause for the strategies we can employ to counter the threat. Here’s a summary of Mr Knox-Johnston’s presentation:

The Metropolitan Green Belt is London’s Lung. The air that we breathe and our wellbeing depends on the preservation of the Green Belt. It is vital re climate change, landscape, biodiversity, access, health and wellbeing (pollution), food and farming.

The sacrifice of the greenbelt to developers in the last two years has been scandalous:



The number of green belt developments in Essex, Herts and Surrey has risen sharply.



4934 hectares of **brownfield land** is available in the Local Planning Authorities boundaries which is not Green Belt land. This could accommodate a minimum of 260,383 new homes. That is more than enough than is needed for the 202,700 proposed for supposedly protected land.

Current housing numbers are based on 2014 ONS figures when it has been widely acknowledged that those figures were wrong. Using 2016 ONS figures brings housing need down to 160,000 nationwide. The Mulheim Report (August 2019) tells us that the current policy focus on increasing housing supply does not offer a solution to the housing crisis and that there will be a surplus of 1.1m houses by 2018.

Jake Berry (Minister DHCLG) stated in April that: “the housing need figure is not a mandatory target. Local Authorities should make a realistic assessment of the number of homes their communities need, using the standard method as the starting point in the process. Once this has been established planning to meet that need will require consideration of land availability, relevant constraints and whether the need is more appropriately met in neighbouring areas... The NPPF is clear that only in exceptional circumstances may a Green Belt boundary be altered, through the Local Plan process. Last year we strengthened Green Belt policy in the revised NPPF”.

Brandon Lewis (Housing Minister 2015) stated clearly that “maintaining strong protection for the Green Belt is national policy and that LAs are required to observe this. In the context of planning applications or appeals, the policy is that unmet housing need alone will not amount to the “very special circumstances” to justify planning permission for inappropriate development on Green Belt. We have repeatedly made clear that demand for housing alone will not change Green Belt Boundaries.”

TWBC is using housing need numbers and the NPPF to justify building on the Green Belt. They say that if they don't provide the housing then the government will come in and take over the planning budget, run the department from Whitehall and force the release of Green Belt anyway. **Where is the evidence for this?**

In 2018, Rt Hon Sajid Javid said “Planning Inspectors cannot enforce Green Belt releases onto authorities. Inspectors can only recommend changes to plans that have been submitted for examination where the plan would otherwise be found unsound, and if requested to do so by the authority. Ultimately the decision whether to adopt a local plan also rests with the local planning authority itself.”

The Government will not take over TW's Planning. There have been three “awkward” councils that have failed to produce Local Plans. They are under threat of action by the Secretary of State for Housing with “an announcement to be made in due course” but nothing has actually happened. No teams flown in, no changes against the councils' will.

The NPPF states (in para 137) that before changes to Green Belt boundaries are proposed, councils should examine fully all other reasonable options, make as much use of brownfield as possible, optimise the density of development and instigate discussions with neighbouring authorities.

Has there been a complete and thorough search for Brownfield land in the borough of Tunbridge Wells?

Enfield had a brownfield register that showed space for 2,700 homes. Residents formed two groups and worked with CPRE London. They looked at aerial views on Google Maps, identified non-green sites that might provide space for housing and then visited each site to see if it would be suitable to register it as brownfield. They found space for 37,000 homes!

Green Belt is the most profitable land for developers.

There is little evidence that any building on the Green Belt is affordable (London Plan Inquiry).

People are beginning to question their Councils.

In Local Elections this year:

- A residents group opposing the Local Plan (R4U) gained control of Uttlesford District Council.
- In Tandridge, a residents group opposed to the Local Plan and building on the Green Belt is now the second largest party on the council. They are refusing to work with Conservatives (who drafted the Local Plan).
- In Guildford, a residents group campaigned on “brownfield first” and to review the Local Plan. They won 15 seats. A Judicial Review has been accepted by the High Court regarding the ousted Council, who adopted the Local Plan just before the elections. Now that the residents have some power, they may be able to prevent the Council fighting the judicial review and thereby force the Local Plan to be redrafted.
- In Mole Valley, the Lib Dems supported the preservation of the Green Belt and gained enough to take over the Council from their Conservative leadership.
- In Tunbridge Wells, the Conservatives lost 13 seats, including the seat of their Leader. An independent group, with their focus firmly on local issues gained 5 seats because the council wasn’t listening to residents.

What can TW residents do?

Lobby MPs and Councillors, make sure that the brownfield register is accurate, resist a Green Belt review and ensure that other reasonable options have been considered.

Standing Up for Kent's Countryside

John Wotton is the Chair of the Kent Branch of the Campaign to Protect Rural England. Save Capel owes a lot to Mr Wotton and his colleagues. They inspired us to be vocal opponents of the assault on Capel as soon as we heard of the proposed housing plans. We continue to work closely with CPRE. Please look at our [blog](#) and come along to their Kent AGM tomorrow evening. Here is John Wotton's excellent speech...

"CPRE is the countryside charity. It exists to protect the English countryside, to make sure it is valued and accessible to all and that it supports a viable and sustainable rural economy. Here in Tunbridge Wells, we are privileged to live in the beautiful and historic farmed and wooded landscape of the Weald of Kent. **We are all custodians of the countryside, none more so, I would suggest, than our local planning authority.**



So, how does the draft Tunbridge Wells Local Plan measure up in terms of protecting our cherished countryside? Not well, in my estimation. The plan is, of course, the product of a broken planning system, driven by political and commercial interests that are wholly divorced from the needs of the population as a whole and wishes of local communities, including this one. It is inconceivable that Tunbridge Wells Borough Council would have come up with a plan of this nature in the absence of the housing and other targets imposed by national planning policy. There is now no pretence that the targets are based on genuine predictions of household growth and housing need, for the most up-to date Office of National Statistics data on population growth and household formation have been ignored by national government, in order to adhere to a totally arbitrary and unachievable target of building 300,000 homes a year (that is homes built anywhere and of any type, regardless of housing need). The rationale for this target has been challenged in recent research by Ian Mulheirn, published by the UK Collaborative Centre for Housing Evidence, which concludes that no more than 160,000 homes per year need to be built to cater for housing need. This topic is highly controversial, but for us in Tunbridge Wells, the key point is that the right homes for the people in this Borough are built in the right places. *(continued overleaf)*

The homes which are built should be affordable to those in need of a home and built in the most environmentally sustainable places, not simply the sites that yield the highest profit to developers. This means that houses should preferably be built on brownfield or urban infill sites, or as limited urban extensions, always making the most efficient use of land, rather than in new settlements on greenfield sites, and especially not in protected landscapes. The Council seems to agree with this in principle, but not in practice.

CPRE naturally wishes to see Tunbridge Wells adopt a sound Local Plan as this will give the local authority a measure of control over future development and better defences against inappropriate, speculative development proposals. However, a sound plan is not a panacea. Factors beyond the Council's control may (and probably will) undermine the Plan during its 15-year life, probably sooner rather than later. These factors include changes in the deliverability of individual sites, failure to build out planning applications which have been granted and, in these febrile political times, changing requirements of national policy. As soon as the Council's housing policies are shown to be out-of-date, the developers will again have the whip hand.

A "Sound Plan" is therefore not to be bought at any price and the price of this draft Plan is, in CPRE's view, far too high. **Tudeley Village is just the most egregious example of the sacrifice of greenfield sites for substantial housing development** in the Green Belt, in the High Weald Area of Outstanding Natural Beauty and elsewhere in the Borough. This sacrifice is made in pursuit of housebuilding objectives that, even in the unlikely event of their being achieved, would do little to meet the genuine local need for housing, at prices local people can afford. The Council say that they place the highest priority on protecting the AONB and then the Green Belt, but this is not the impression I gain from the proposed site allocations throughout the Borough. If Tudeley Village is intended to relieve the pressure on the rest of the Borough, it does not achieve this, even in protected areas. In my own Parish of Cranbrook and Sissinghurst in the AONB, for example, the housing allocation exceeds assessed local needs by about 50%.

What can the Council do, though, in the face of seemingly implacable national policy requirements? In our view, national planning policy does allow Tunbridge Wells to provide for less than the so-called objectively assessed housing need, in view of the high proportion of the land in the Borough which is protected as Green Belt or AONB. This ability is fundamental to the effective protection of the Green Belt and AONBs. If it were not there, the Green Belt and AONB would be less protected in those districts in which they form a large proportion of the land area than in those where only small areas are protected.

This is not the law, or the policy of government. *(continued overleaf)*

The Council say that they have not even considered the possibility of providing for less than assessed housing need, because their Strategic Housing Land Assessment shows that the Borough can accommodate this need. However, it is hard to see how they have reached this conclusion.

Their Sustainability Assessment shows that the Council's housing objective is compatible with only 5 of the 19 sustainability objectives they have set themselves and incompatible with 9 of them. It is the only objective in the Plan which fails the Council's sustainability tests in this way. This is a **fundamental contradiction** in the Plan. It does not provide for sustainable development in Tunbridge Wells on the Council's own terms, and it must be changed.

I haven't said much about how the technicalities of planning policy apply to the overarching subject of the **climate emergency**, which rightly moves ever higher up the political agenda, including the planning agenda.

It is far from clear to me that the Council gives adequate weight to **mitigating climate change** in this Plan. That is a wider topic than we can embark upon today, but an aspect of it is specifically relevant to the Tudeley Village proposal. Under the government's climate change guidance, planning authorities are advised that the distribution and design of new settlements and sustainable transport solutions are particularly important considerations that affect transport emissions.

The Planning Inspectors have within the past week rejected the draft **West of England Spatial Plan**, saying that high levels of dispersed development across the West of England, unguided by any strategy, would not be sustainable. I understand that this plan included a number of so-called "garden settlements" on greenfield sites.

It would seem that garden settlements are going to be looked at closely by Inspectors and this should make Tunbridge Wells Borough Council think twice before trying to meet its housing objectives in this way.

Tudeley Village is the poster child for the unsustainability of this draft Plan. It represents unsustainable, environmentally harmful destruction of the countryside, replacing a beautiful, unspoilt and protected site with a dormitory for City commuters and their families, heavily reliant on their private cars for transport. It will destroy local communities and ruin local residents' lives. **It must be stopped and CPRE Kent will support you in your campaign.**

Moving Forward

The Convenor of our Campaign team, Mark Ginsberg, updated us all on the way Save Capel operates and then led a series of votes before the meeting came to a close.

Save Capel was established as a working party of Capel Parish Council on June 4th 2019. It quickly evolved into a campaign group, with objectives closely aligned to those of Capel Parish Council, primarily to oppose the huge amount of additional housing proposed in the Metropolitan Green Belt in the draft Local Plan. On June 4th, a number of teams were established to gather evidence and explore arguments to oppose the proposals. Each team nominated a Convenor to arrange regular meetings and help create and circulate minutes and actions. The Convenors communicate regularly and meet regularly as a Steering Team, which also has the vital assistance of three Capel Parish Councillors. There are 11 members of the Steering Team and an additional 65 people across the following teams:

- Highways & Transport
- Landscape, Biodiversity & Ecology
- Housing & Planning
- Flooding & Sewerage
- Campaign Strategy
- Fundraising
- Legal

The Steering Team has a Chairperson who is elected by the team every six months. Convenors can share responsibilities or change from time to time, with teams nominating their next Convenor(s) by mutual agreement.

Our audience was asked (via a show of hands):

Do you live in the Parish of Capel? *Estimated 200 of the 300 attendees.*

Capel residents were then invited to vote on the following:

Are you happy with the way that Save Capel operates and the progress made to date? **Yes** (*overwhelming majority*)

Do you feel that you have been well supported and well represented by Capel's Borough Councillor? **No** (*overwhelming majority*). *Less than 5 hands raised for Yes.*

Would you vote for a Borough Councillor who makes Save Capel's aims a main focus of their campaign at next May's borough elections? **Yes** (*overwhelming majority*).

The audience had the option of leaving an anonymous written message in a suggestions box (skilfully adapted from a shiny new TWBC food waste caddy!) to allow comments on any of the above. They were also encouraged to post written notes in to the CPC postbox if they had a comment for Save Capel.

What Now?

Our focus for the next 40 days will be enabling everyone in Capel to discover the detail of the Local Plan, how it will affect them and to respond accordingly in the correct format at the correct time.

This is no small task. We are determined to reach all households and businesses in the parish, helping those without internet access or those requiring technical assistance to get their responses logged and acknowledged. We are doing this with the blessing of TWBC's Planning Team. They want this plan to succeed and community engagement is key.

We will be producing some guidance notes to highlight elements affecting Capel within the Local Plan and its supporting documents. These notes will also draw your attention to key issues and reference the NPPF and other policies where appropriate. They are a guideline only. Your own responses should be personal, heartfelt and completely yours. We don't expect you to submit a copy/paste, cookie cutter version of our views. We do, however, hope that you will feel free to send us your draft comments, thoughts and ideas so that we can help you to be confident in your submissions.

Save Capel is a totally voluntary public service. We have a team of Capel folk who can respond to you in person, at home, at work or via clubs and meetings. We can phone, email or visit in person. **Please do ask for help if you need it. We won't get a second chance at the public consultation and we know that everyone has an opinion in this parish! We look forward to hearing from you via savecapel@gmail.com or the Capel Parish Council postbox at the Village Hall in Five Oak Green.**

Capel Greenbelt Protection Society

A charity is being set up to protect Capel's Green Belt. Save Capel will work in partnership with CapelGPS, who will kindly gather and manage funds raised for our campaign, alongside other activities to deliver their vision.

CapelGPS aims to improve, protect and preserve for the benefit of the public the countryside around the Parish of Capel near Tonbridge in Kent, especially the Metropolitan Green Belt and the High Weald Area of Outstanding Beauty.

The vision of CapelGPS is long term, with the following objectives:

- To stimulate public interest in the area of benefit.
- To promote high standards in planning and architecture in the area of benefit.
- To secure the preservation, protection, development and improvement of features of historic or public interest in the area of benefit.

They have a Chair, Deputy Chair, Treasurer, Secretary and Campaign Co-ordinator as Trustees.



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adult



Saturday 12th October 2019
10am start at carpark at Capel Community
Centre, Capel Recreation Ground.

Register at... **savecapel.com**

All Ramblers walk at their own risk and Save Capel cannot be held responsible for any injury or other occurrence