

From: Save Capel <savecapel@gmail.com>
To: correspondence@communities.gov.uk
CC: Michael Gove; Greg Clark; Tom Tugendhat MP
Sent: Tue, 19 Oct 2021 12:04
Subject: Tunbridge Wells Local Plan

FAO. The Rt Hon Michael Gove MP

cc. The Rt Hon Greg Clark MP
Tom Tugendhat MBE MP

Dear Mr Gove

I am writing on behalf of the 2,000 registered supporters of Save Capel, particularly with regard to Prime Minister Johnson's recent Party Conference speech.

During his "build back better" speech on October 6th 2021 Mr Johnson said:

"...not on green fields, not just jammed in the Southeast, but beautiful homes on Brownfield sites in places where homes make sense."

In Tunbridge Wells Borough, the rural farming Parish of Capel is currently facing a draft Local Plan which has a core strategy that contradicts the sentiment and the words of our Prime Minister. I would like to draw it to your attention, whilst there is still time to act.

In short, Tunbridge Wells Borough Council (TWBC) is proposing to build 51% (4,160 homes) of its draft local plan's new site allocations in Capel, which currently has around 950 houses and a population of 2,500. Our historic parish was once described as one of the best medieval landscapes in northern Europe, with undulating fields dating back to the Domesday Book. The proposed sites are bounded by precious heritage assets such as the Grade I listed Church of All Saints, internationally famous for being the only church in the world with all its stained-glass windows crafted by Chagall.

"Not on green fields"

All of this proposed development is on carbon-absorbing green fields. Worse, these green fields are all within the Green Belt – protecting urban sprawl evolving between Tonbridge, Five Oak Green and Paddock Wood. And worse again, the vast majority of the 600+ acres to be developed is high quality and productive farmland with miles of biodiverse hedgerows and ancient woodland.

TWBC's Local Plan is diametrically opposed to everything Mr Johnson has just declared important and disregards the very purpose of the Green Belt itself. To persuade councils like Tunbridge Wells to realign the plan to the Prime Minister's vision, his words need to be written into planning policy.

"Not just jammed in the Southeast"

Our analysis suggests that the TWBC housing needs assessment is overstated by at least 30% and does not align with the projected population growth or demographic. In fact, the calculated need of 12,200 houses, for a borough with a projected population growth of 6,100, is not logical. Blindly following the housing needs methodology is unnecessarily "jamming" housing into the Southeast, which will of course then attract movement, rather than identifying what is appropriate to meet local needs.

On one hand, the TWBC draft Local Plan states “there are no exceptional circumstances to depart from this national default, standard method”. On the other, they claim “exceptional circumstances warrant” the need to build on Green Belt. How can these statements co-exist? *If exceptional circumstances exist to build on Green Belt, then surely the same exceptional circumstances should warrant departure from the standard method to avoid building on Green Belt, and certainly not so extensively or as the core policy of a Local Plan.*

And further, to try and justify the huge infrastructure costs required to build the disconnected Tudeley Garden Village “island”, TWBC is offering to “*assess the potential for also contributing towards unmet needs from elsewhere*”, which would be built on Capel’s Green Belt.

“On Brownfield sites”

Our analysis shows that there are large reserves of brownfield sites around the borough which are not being adequately targeted by TWBC. These fall in both urban and rural areas, including government owned sites such as decommissioned HM Prison Blantyre House (promoted by the ministry’s agent).

Whilst 75% of the Borough is designated AONB/MGB (in the case of Capel, also adjacent to or on a flood plain), 25% is NOT and yet a disproportionately small amount of development is earmarked for these areas away from the strategic sites. This does not support the rationale that release of Green Belt is justified by “exceptional circumstances”.

“Places where homes make sense”

The two strategic sites identified by TWBC have insufficient existing infrastructure to support them, with two new by-passes proposed cutting through both AONB and MGB. Both sites are flood prone due to proximity to the Medway and one being a functional floodplain.

The Southeast mainline railway bisects the proposed Tudeley Garden Village, but Network Rail has confirmed there will not be a new station at Tudeley within the plan period, if at all. It is also remote from most of the borough. It is however closest to Tonbridge (and the Borough of Tonbridge and Malling), which will be inundated with an estimated 3-4000 cars per day accessing schools of choice and other amenities, as well as the excellent rail links from Tonbridge Station. There is only one narrow B-road (B2017) to connect it into Tonbridge’s highly constrained road network. The plan does not address these constraints.

Further, Tudeley Garden Village – the principal development site - would be built on agricultural land sloping towards the Medway floodplain, these areas already badly affected with surface water flooding issues. Concreting over these slopes can only increase the risk of flooding in Capel and Tonbridge & Malling – a regular occurrence in recent years.

Far more sustainable alternatives have been identified but ignored or rejected for spurious reasons. The motives for this adherence to the less suitable ‘strategic sites’ are open to question, but it is our view that Tunbridge Wells Borough does not need a new commuter town on green field land - and Tonbridge does not need its stretched infrastructure burdened by thousands of new residents in the adjacent borough.

Evidence suggests that for Garden Towns/Villages to make sense, they must integrate with existing infrastructure and the Tudeley Garden Village does not in any way. It clearly does NOT “make sense”.

The proposals for East Capel, which would complete a “wagon wheel” of construction around the town of Paddock Wood, are to build on a flood plain. This also “makes NO sense”.

I realise this is quite a long letter and appreciate any time you have taken to review it. I am also aware that as the new Secretary of State for Levelling Up, Housing and Communities you are reviewing the current Planning system. Whilst I understand that you would not usually comment directly on individual local plans, put in the context of the Prime Minister’s speech and your new responsibilities, I would like to ask:

1. For your opinion on how the core strategy of building on Green Belt in the draft Tunbridge Wells Local Plan aligns with the future vision for our country?
2. If your review of the Planning system will address the issues identified above, specifically:
 - a. Using default housing needs, unchallenged, to justify destroying large areas of Green Belt?
 - b. Offering to take “unmet needs from elsewhere” by building on the Green Belt?
3. Unlike many other councils*, TWBC has not paused its plan - to seriously address the public outcry, nor the vision outlined by our Prime Minister. To halt this damaging incursion into the Green Belt, there must be retrospective changes to policy and law to stop such massive developments from countering the government’s stated intentions. Will the forthcoming public inspection be able to stop the TWBC Local Plan and make developments such as those being proposed for Capel unlawful?

** Examples include North Dorchester, Medway, Three Rivers (Watford), Dacorum (Hemel Hempstead), Portsmouth, BCP (Bournemouth, Christchurch, and Poole)*

I would be most grateful if you would kindly give this matter your urgent attention.

Yours sincerely

Stewart



STEWART GLEDHILL
Chair
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