

From: Stewart Gledhill <savecapel@gmail.com>  
Sent: 26 September 2021 12:20  
To: Tom Dawlings (Cllr) Cc: CLARK, Greg; Sarah Hamilton; Hugh Patterson (Parish Chairman)  
Subject: Local Plan - Capel

Dear Cllr Dawlings

I am writing this on behalf of our 2,000 supporters who are outraged by the Council's blatant disregard for Capel's historic landscape.

You have announced the Council's priorities in the latest publication of "Local" which claims that the new local plan will protect the countryside, but only away from the areas of planned development. More than 50% of TWBC's identified housing need is being forced on the rural hamlets and villages of Capel and the small town of Paddock Wood. This demonstrates an absolute disdain for the parish of Capel which is earmarked for a 500% housing increase, once described as one of the best medieval landscapes in northern Europe, with undulating fields dating back to the Domesday Book.

You also stated "environmental concerns have to be at the heart of everything the Council delivers" despite the proposed destruction of over 600 acres of productive farmland in the green belt, with substantial infrastructure being required that would further damage the environment.

Save Capel supports the need for a new local plan that provides affordable and environmentally sustainable housing. Robert Jenrick, then as housing minister, recently visited the borough with you and confirmed that priority should be given to town centre regeneration, the development of brownfield sites before turning to greenfield sites, and the protection of precious greenbelt land. There appears to be a complete disconnect between government policy, your stated ambitions versus the actual strategic policies in the draft local plan. Save Capel believes that the Sustainability Appraisals of the policies presented at Regulation 19 are disingenuous and do not adequately assess all the options available, which could provide a far more sustainable alternative.

The Council's priorities also recognise the need for a plan for Royal Tunbridge Wells town centre, but this has not been included in the draft local plan which was rushed through consultation (Regulation 19) before covid measures were eased. Save Capel urges the Council to reconsider the numerous brownfield opportunities, which have increased from the recent change in government legislation on permitted development and the effects of the pandemic; as the empty shops and offices that proliferate Tunbridge Wells more than adequately demonstrate.

Stephen Baughen has confirmed that "the Council is still reviewing the representations submitted at Regulation 19" and the Plan is so unpopular that it has consistently been rejected by 90-95% of respondents. We request that you take time to re-assess the strategic allocations and avoid wasting taxpayers' money on the progression of the current draft through an inspection.

In any event, our supporters deserve to hear your explanation of why you do not believe Capel's historic landscape is worth protecting. I look forward to your early reply.

Kind regards

Stewart



STEWART GLEDHILL  
Chair  
Save Capel Executive  
Web: [savecapel.com](http://savecapel.com)

From: Tom Dawlings (Cllr)  
Sent: 28 September 2021 16:19  
To: Stewart Gledhill  
Subject: Re: Local Plan - Capel

Dear Mr Gledhill,

Thank you for your email. It is probably impossible to make a brief statement about a subject as sensitive as the Local Plan to anyone who lives near an area which is earmarked in the Local Plan for significant development. Capel is one of those areas. This has all arisen because of the unrelenting pressure to provide more homes. The opening words of my statement were "I understand the opposition" and I genuinely do, not least because I live in Benenden and two areas in Benenden were submitted as sites for rural settlements in response to the call for sites. I heard both the cries of anguish and the sighs of relief when the planners determined the sites were unsuitable.

I absolutely stand by my comment that environmental concerns have to be at the heart of everything the Council delivers - that is something I take very seriously indeed. The Local Plan contains a variety of policies that deliver on this including a new positive approach to biodiversity (including the principle of net gains), over 200 Local Green Space designations and a new green infrastructure policy. The Plan also focuses on maximising development on brownfield land.

I would also strongly refute any suggestion that consultation on the Local Plan has been 'rushed through' - the consultation period for Regulation 19 was extended and it was preceded by Regulation 18 consultation. All stages of the Plan were overseen by the Planning Policy Review Group and it was approved for consultation by a large majority on a cross-party basis.

The production of the Local Plan to meet government-required housing targets in the Tunbridge Wells Borough has been tortuously difficult, but I also recognise the dangers associated with not having a sound Local Plan and the attendant consequences of 'development by appeal'. I am confident that we have produced a sound and sustainable Local Plan which has strongly sought to maximise opportunities for brownfield development. Clearly, if you feel this is not the case, you will have the opportunity to raise your concerns with the independent Planning Inspector.

Yours sincerely,

Tom

Cllr Tom Dawlings  
Leader of Tunbridge Wells Borough Council  
T: 01892 554130 | M: 07809 770035  
E: tom.dawlings@tunbridgewells.gov.uk  
Town Hall, Royal Tunbridge Wells, Kent, TN1 1RS

From: Stewart Gledhill <savecapel@gmail.com>  
Sent: 04 October 2021 16:03  
To: Tom Dawlings (Cllr) Cc: CLARK, Greg; Sarah Hamilton; Hugh Patterson (Parish Chairman)  
Subject: TW Local Plan - Climate Emergency

Dear Cllr Dawlings

Thank you for your reply of 28th September to my earlier email.

Unfortunately, you have raised more questions than were answered, including three specific but related points I wish to raise here:

Firstly, you state that "...environmental concerns have to be at the heart of everything the Council delivers..." However, at the very heart of the Local Plan is the destruction of greenbelt countryside, including highly productive fields and orchards in Capel; the so-called 'strategic sites.' Apart from the removal of carbon-absorbing countryside, the proposals will create significant pollution of air, noise and light quality, adversely affecting the health and well-being of those living in the area over the decades of construction and beyond.

You will be aware of a key report recently published by the Royal Academy of Engineering (RAE) and highlighted last week by The Architects' Journal and the BBC. The report concludes that construction is responsible for immense impact on climate change by generating CO<sub>2</sub>, a well-known greenhouse gas. This is some 8% of the generation of greenhouse gases globally. The RAE recommends repurposing existing buildings to minimise CO<sub>2</sub> generation.

Save Capel's pollution report, submitted at Regulation 19, estimated that construction of just the foundations of 4,900 houses would generate 17,000 metric tonnes of CO<sub>2</sub>. This does not include greenhouse gases generated by other related construction activity (roads, parking areas, construction vehicles, etc), nor the negative effect of the loss of carbon-absorbing fields. The Council's estimate for its own carbon emissions for 2018/19 was 3,473 tonnes, so it is clear the local plan will involve enormous carbon dioxide production at precisely the time the Council needs to reduce greenhouse gas production.

Indeed, when we look at the Council's Climate Emergency Advisory Panel's 'Corporate Carbon Reduction Plan' of 11 March 2021, published in the knowledge of the local plan's proposals, there is no mention of the carbon effects of construction. This is despite acknowledging the need for a "carbon assessment toolkit/process for all projects/committee reports". The report also states the Council "...now needs to work towards rapidly reducing its footprint to achieve this target, building and accelerating on the emissions reductions that have previously been achieved throughout the organisation." But the proposals for construction in Capel alone will ensure that the targets the Council has set itself cannot be met by 2030, some 8 years before the end of the local plan's lifespan.

The huge construction effort proposed for Capel alone will not merely negate, but likely far outstrip all efforts to reduce carbon in the borough, as described in the Carbon Reduction Plan mentioned above. This will add significantly to the climate emergency and environmental damage, so you may wish to clarify your statement that environment concerns lie at the centre of the Council's policies.

Secondly, you claim that the local plan "...focuses on maximising development on brownfield land." This is a startling claim when one only has to walk Tunbridge Wells' High Street to see the empty shops and offices, as well as the ongoing eyesore opposite the Town Hall; a vision of urban decay that urgently needs addressing. The local plan singularly fails to focus on the development of brownfield sites, which have been increasing steadily during the pandemic.

The RAE report states that "Government should ensure that the building, planning and consent stages take better account of both the carbon performance and the potential co-benefits, such as improved health and job creation, that can be achieved through retrofit options as opposed to building new." The repurposing of buildings from commercial and office space into accommodation

is far less damaging to the environment than development of greenfield from scratch, and if the Council were really serious about carbon reduction this would be the focus of the local plan.

Third, and whilst I am pleased for the residents of Benenden who do not have to suffer such unnecessary large-scale development and the consequences that it brings, as Leader of the Council you have a responsibility to residents across the entire borough, including those of us who live in Capel.

I therefore request once more that you ask the Council to pause and rework the local plan with a new focus on urban regeneration and brownfield development, whilst removing the most environmentally damaging proposals for greenbelt development in the borough. All residents of this Borough want to see their town flourish and their countryside green, with a local plan that truly and believably has an environmental duty of care at its core.

Finally, I note you make no mention of the permanent damage that will be inflicted upon Capel's historic landscape, which my first email raised. Apart from the points above, you have still to address this. I expect these important issues will be given full consideration at Wednesday's council meeting. I look forward to a more positive response from you.

Yours sincerely  
Stewart



From: Stewart Gledhill <savecapel@gmail.com>  
Sent: 27 October 2021 12:50  
To: Tom Dawlings (CIlr)  
Subject: TW Local Plan - Climate Emergency

Dear Tom

I understand that the council is continuing to progress the draft local plan and would submit it for inspection shortly. Frankly, we are dismayed that you have not paused the plan, to defend the borough's greenbelt and our historic landscape, given the numerous other LPAs that have done so. It is not just about Mr Johnson's speech at conference, as there also appears to be a direction of travel from Mr Gove and his team who are under increasing pressure to enshrine Mr Johnson's stated objectives in planning law.

I would be grateful for your prompt reply and response to my email of 4th October.

Yours sincerely

Stewart



From: **Tom Dawlings (Cllr)**  
Date: Fri, Nov 12, 2021 at 4:08 PM  
Subject: Re: TW Local Plan - Climate Emergency  
To: Stewart Gledhill <[savecapel@gmail.com](mailto:savecapel@gmail.com)>  
Cc: CLARK, Greg

Dear Mr Gledhill,

I am sorry I had thought I had replied to your email of 4th October but find I had not - apologies.

The Council's carbon reduction plan is to reduce the Council's carbon emissions to net zero by 2030. It is not to reduce the emissions of every property, business or vehicle in the Borough, although where we can help in this, for example through building regulations in requiring properties in the Borough to be built to a standard to minimise carbon emission, then we will. I understand that developers now install EV charging points on new homes with off-street parking and the Council is installing EV charging points in the car parks we own and manage.

The Council's carbon emissions are mainly from:

- our buildings, notably the Town and Assembly Halls, the Sports Centres and the Crematorium and we are actively working on improving the energy efficiency of these buildings
- vehicles, especially the waste collection vehicles where for the moment there is no economically sensible alternative to the diesel vehicles used at present, but this will change before 2030.

I have no doubt that there are significant carbon emissions involved in the construction of houses. Equally there is no doubt that more homes are needed in our country and the same level of carbon emission will result from the construction of new homes wherever these homes are built.

Previously developed land is prioritised over greenfield development but there is insufficient brownfield land for the housing needed. Town Centres also need employment and leisure opportunities as well as homes. The cinema site in Tunbridge Wells has an extant permission for 99 apartments as well as some retail and business areas. Having obtained planning consent, the owners/developers unfortunately concluded that building out the approved scheme would not be viable and so the regrettable cycle of buy, establish that a good return is not possible on the site and then sell to make good the outlay unfortunately continues.

As you are now aware, the Council's Local Plan has been submitted for examination and all comments that you want to make can now be made to the Inspector.

You ask why the process was not paused. The production of a Local Plan is a long process and in changing times would be a never-ending process if every ministerial comment led to a pause. Changing circumstances, however, have led to alterations being made without pausing the process - for example the Pre-Submission version of the Local Plan included changes to recognise the Covid pandemic, including the changing needs of businesses, the demand for office accommodation and the potential for more residential development in town centres. When I became Leader at the end of May, the Full Council had already approved the Pre-Submission Local Plan by a substantial majority with widespread cross-party support and so I was in no position to even seek to pause the process.

The Council has to produce a Local Plan based on national planning policy and legislation as it is and not based on how it might potentially be changed. Announcements from Government do suggest some policy re-thinking and if there were changes to national planning policy or the Government altered the housing numbers for boroughs like ours then the Inspector will raise this and want to discuss it during the Examination of our Local Plan. The Inspector also has the ability to recommend modification of the Plan. If there are significant policy/legislative changes, the Council may decide to

withdraw the Plan or not to adopt it after examination. I think it is also worth pointing out that the production and review of the Local Plan is a continual process and as soon as the Plan is adopted work will begin on the required five-year review of the Plan.

Having a new Local Plan is important because, whilst the housing supply position in the borough is improving, the Council cannot demonstrate a five-year supply of housing. This makes the borough vulnerable to speculative development and planning by appeal. This is demonstrated by the recent planning appeal for 400 houses at Hawkhurst where the Council's decision to refuse planning permission has been weakened by the lack of a five-year supply of housing. The adoption of the Local Plan will re-instate a robust housing supply. Perhaps more important is the fact that the policies which are used day in day out in the determination of planning applications need updating. The new policies will boost the supply of much needed affordable housing, particularly for social rent, and the amount of housing needed for the elderly and disabled and will ensure that new buildings are much more carbon efficient and sustainably designed.

Finally you ask me to explain why I don't believe that Capel's historic landscape is worth protecting. I have made no such judgement. Local Planning Authorities set out policies against which to assess planning applications and, for the Local Plan, the suitability and sustainability of the sites put forward by landowners for development. There are protections, notably in this borough on Areas of Outstanding Natural Beauty, but these areas are not determined by the Local Planning Authority.

Yours sincerely,

Tom

**Cllr Tom Dawlings**

**Leader of Tunbridge Wells Borough Council**