

Report on

Alternatives to Tudeley Garden Village (STR / SS3) and Paddock Wood / East Capel (STR / SS 1) Developments

In response to the Tunbridge Wells Borough Council
Pre-Submission Local Plan under Regulation 19

Prepared on behalf of Save Capel (Housing & Brownfield Team)

Contributors: Mark Colyer, Nick Gandon, Sarah Jones, Nigel Lambert,
Petrina Lambert, Konrad Legg, Jan Mueller, Andy Rankine, Andrew
Stanley, Nigel Tansley

Contact: Jan Mueller

CONTENT

A. Introduction	3
A.1. Report Objective and Content.....	3
A.2. Report Structure.....	3
B. Overall Feedback on the TWBC Pre-Submission Local Plan	4
B.1. Decision-Making and Due Diligence	4
B.2. Climate Emergency / Green Belt	5
B.3. Disproportionate Impact on Capel Parish	6
C. Sustainability Assessment	8
C.1. Site Characteristics of SS3 (Tudeley Village)	8
C.2. Critique of the TWBC's Sustainability Assessment for SS1 and SS3.....	9
C.3. Implications for the Sustainability of the Plan.....	10
C.4. Sustainability Appraisal for Selected Alternative Sites.....	29
D. Alternative Solutions	46
D.1. Rejected Sites Suggested for Review	46
D.2. Brownfield Potential	49
D.3. Increasing Housing Density	51
D.4. Alternative Housing Solutions.....	53
E. Conclusion & Next Steps	64
Appendix.....	65
Appendix A. Rejected Sites – Rationale for Reconsideration for each Site	65
Appendix B. New Brownfield Site List	70
Appendix C. Assessment Comparison of Site 190 vs. SS3 (Tudeley Village)	74
Appendix D. Sources.....	75
Appendix E. Density Calculations	75

Errors & Omissions Excepted

A. Introduction

A.1. Report Objective and Content

This report has been compiled in response to Tunbridge Wells Borough Council's (TWBC) proposals to build over 4,000 houses on Green Belt, productive agricultural land in Capel Parish. We believe these proposals to be misguided and unsustainable.

The objective of this report is to highlight feasible alternatives that would allow TWBC to achieve its housing target without resorting to the destruction of over 600 acres of Green Belt land in Capel Parish.

The report provides a summary of suitable sites and alternative solutions to building on Green Belt. We have been actively searching for suitable sites and solutions. TWBC should be significantly more proactive in this regard.

This report was first issued as an 'Interim Report' in response to Regulation 18 and has since been updated and will now be re-issued in response to Regulation 19.

A.2. Report Structure

The report commences with a contextual section to set the scene: **Section B.** provides general feedback on the Local Plan and proposed developments in Capel. This includes commentary on Plan methodology and decision-making, climate considerations as well as the impact on Capel parish.

In **Section C.** we provide a critique of TWBC's sustainability appraisals of the Tudeley and East Capel sites - and by implication of the total plan. We also assess the sustainability of selected alternative sites in comparison to Tudeley Village / East Capel.

Section D. seeks to highlight alternative solutions to achieve TWBC housing target. Here, we investigate the following topics:

- (1) How many sites submitted for development were rejected by TWBC in Reg18 but - in light of the decision made to develop land in Capel - should be reconsidered?
- (2) How many sites in the borough are available for development (brownfield and other categories) which are not registered on TWBC's system and what is their housing potential?
- (3) What is the additional housing potential if land were to be used more effectively?
- (4) Are there alternative solutions to improve effective use of land by developments?

In closing, **Section E.** contains a summary of conclusions and recommendations

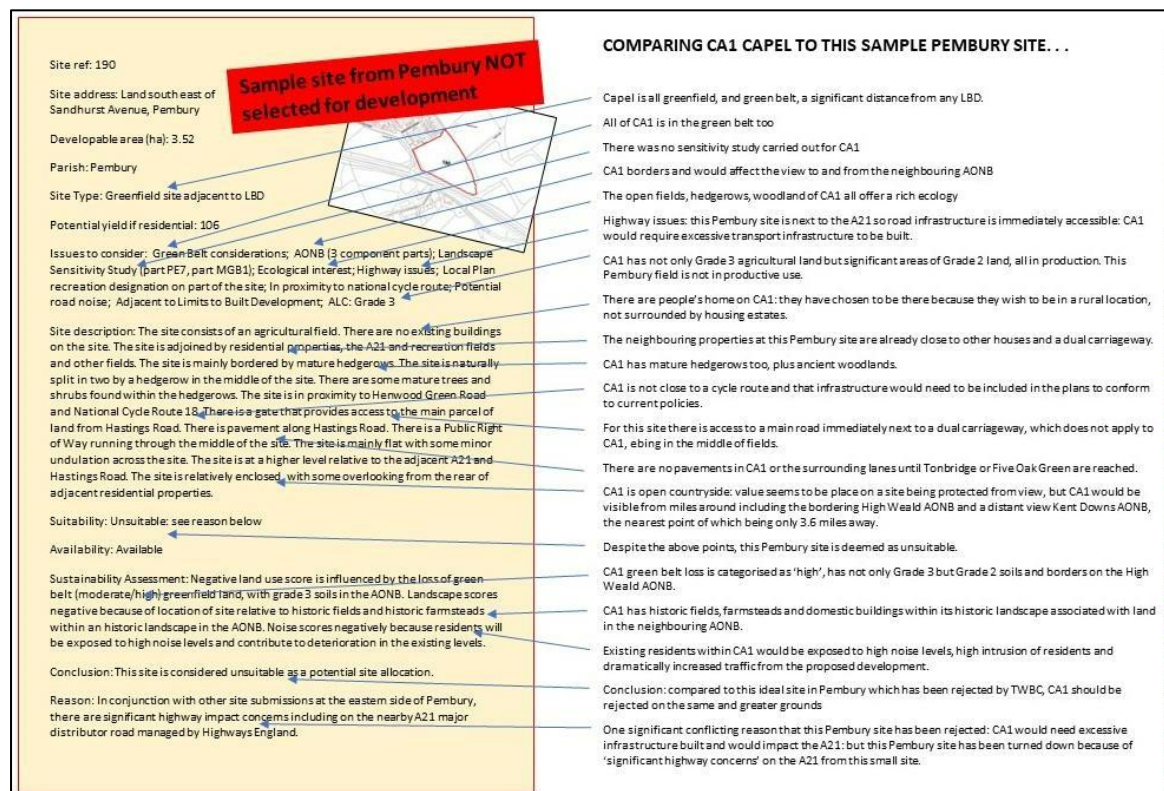
B. Overall Feedback on the TWBC Pre-Submission Local Plan

B.1. Decision-Making and Due Diligence

The TWBC Pre-Submission Local Plan ("Plan") has been years in the making and a lot of careful work and analysis has been undertaken to reach some well-founded and justifiable proposals. The Strategic Housing and Economic Land Availability Assessment ("SHELAA") documents in particular are generally well thought-out and sound reasons are given for approving or declining sites which had been submitted by landowners.

However, this makes it all the more striking that **the proposed development at Tudeley Village (STR/SS 3) and East Capel (STR/SS 1) seem entirely inconsistent with** - in fact diametrically opposed to - **the standard evaluation criteria, decisions and overall tenets of the Plan**. There is a contradiction between the assessment of sites SS1 / SS3 relative to almost all others. The typical reasons for rejecting sites were based on environmental, infrastructure and sustainable development concerns – reasons that we would typically agree with. Unfortunately, when assessing SS1/3 these very same criteria seem to have been completely disregarded. For illustration, please see Figure 1 below – this is just one example, but we could cite many more. As a result, **we question the objectivity and consistency of site assessments for SS1/3 as here the Plan seems to employ double standards.**

Figure 1: Assessment Comparison of Sites 190 vs. SS1 (Tudeley Village)
(Larger version for printing available in Appendix C.)



This also inspired an analysis of 'rejected' SHELAA sites which we will return to in Section D.1.

It is hard not to be suspicious that the inclusion of SS1/3 was primarily driven by the sudden appearance and convenience of having a willing landowner to provide a large bulk of land as opposed to being selected based on objective and consistent criteria.

B.2. Climate Emergency / Green Belt

While the 'tectonic plates' of global climate change move slowly, scientific studies have evidenced the reality of global warming since the 1970s. It is now a generally accepted fact that fighting climate change will be one of humanity's defining challenges in the 21st century – including in the borough of Tunbridge Wells.

In this context – and while this may fall outside the confines of planning criteria – **the Plan's proposal to sacrifice 600 acres of Green Belt land and >5% of its total Green Belt 'land bank' seems severely short-sighted and frankly irresponsible.**

Implementing this will cause irreversible damage to the natural environment, decrease biodiversity, contribute to pollution and climate change, and deprive future generations of much needed green space. It is inconceivable that such proposals will be deemed appropriate in years to come.

It is also in complete contradiction to TWBC's announcement of a Climate Emergency - a conflict of policies which is not addressed in the Plan.

It is becoming well established that any open area of land, even simple grassed areas, are essential in carbon capture, so to lose such large swathes of Green Belt is counter to the increasing move for reforestation.

The crops currently grown in SS3 will need to be grown elsewhere, ultimately leading to new farmland being created at the expense of woodlands and forests - here or elsewhere in the world.

In addition to needing more – not less – agricultural land in the future, because of the increasing population, it seems likely that alternatives to fossil fuels will be plant-based, putting even more pressure on agriculture.

To build large expanses of houses in Capel, or Paddock Wood, or anywhere else on open countryside – and in fact any undeveloped land in general – is completely opposite to the progress that society is making in recognising the value of the environment.

Whilst we appreciate the need to fulfil housing requirements and that the National Planning Policy Framework ("NPPF") makes allowance for the release of Green Belt land under 'exceptional circumstances', we propose that

- building on Green Belt land should be an absolute last resort, and not the core contribution and lynchpin of TWBC's Plan
- there are viable alternatives that have rejected / not sufficiently explored and that would fully satisfy the borough's housing requirements
- the Plan fails to substantiate a case of 'exceptional circumstances' to release GB land

- the proposed development at Tudeley Village in particular is completely inappropriate: vastly excessive in land use versus the housing numbers proposed and carving a large 'black hole' in the Green Belt – with proposals to swallow surrounding AONB/GB land in future planning periods

In summary, the existing Plan feels like a tactical tick-box exercise. It lacks both the courage and initiative to re-imagine how to make efficient and best use of the land in the context of climate change - instead preferring to take the 'easy option' of building on the Green Belt.

We strongly urge TWBC to re-think their planning approach – prioritising the retention of Green Belt / greenfield land and encouraging innovative solutions to redevelop and encourage better use of developed land at higher housing density.

B.3. Disproportionate Impact on Capel Parish

When examining the Plan and its supporting documentation it is obvious that Capel Parish – and the small settlement of Tudeley in particular – is expected to take on a significant proportion of Tunbridge Wells Borough's total perceived housing need. The intended allocation for Capel Parish is vastly disproportionate to its share of the borough's total territory, population, housing stock and / or need. **This imbalance is neither required nor equitable.**

Figure 2: Comparison of Population vs. Approved Housing by Parish

#	Parish	Population		Approved Housing (Plan)	
		2011	% of total	Dwellings	% of total
1	Benenden	2,400	2.1%	91	1.0%
2	Bidborough	1,163	1.0%	0	0.0%
3	Brenchley and Matfield	2,863	2.5%	58	0.6%
4	Capel	2,467	2.1%	4,160	45.3%
5	Cranbrook and Sissinghurst	6,700	5.8%	460	5.0%
6	Frittenden	888	0.8%	28	0.3%
7	Goudhurst	3,327	2.9%	25	0.3%
8	Hawkhurst	4,991	4.3%	166	1.8%
9	Horsmonden	2,435	2.1%	280	3.0%
10	Lamberhurst	1,706	1.5%	28	0.3%
11	Paddock Wood	8,253	7.1%	1,922	20.9%
12	Pembury	6,128	5.3%	403	4.4%
13	Royal Tunbridge Wells	48,324	41.8%	1,476	16.1%
14	Rusthall	4,976	4.3%	15	0.2%
15	Sandhurst	1,478	1.3%	25	0.3%
16	Southborough	12,459	10.8%	42	0.5%
17	Speldhurst	4,978	4.3%	11	0.1%
	TOTAL	115,536	100.0%	9,189	100.0%

Note: Housing at SS1 that falls within Capel Parish has allocated to Capel (as indicated under 4.5.3 of the PSLP)

Whilst only accounting for 2% of the borough's population, Capel Parish is expected to close to 45% of the borough's housing needs. This reflects the Plan's lopsided nature that proposes to squeeze ca. 66% of total housing into just 2 parishes at the North West boundary of the borough (Capel and Paddock Wood). This in no way complies with the policy to reflect *local* housing needs. It also imposes a vastly disproportionate burden on these two parishes and will irreversibly change the semi-rural nature of Capel to the detriment of its current community.

We strongly recommend a more equitable distribution of development across the borough.

This should include a better-balanced housing allocation across parishes, a focus on regenerating Tunbridge Wells town centre, extending existing settlements where appropriate, a stronger emphasis and leverage of brownfield sites and the prioritisation of building outside of Green Belt / AONB land.

C. Sustainability Assessment

C.1. Site Characteristics of SS3 (Tudeley Village)

Turning to SS3 – the site earmarked for the development of Tudeley Village – itself, it is hard to imagine a site less suited to larger scale development.

Key considerations that make this site unsuitable for situating a Garden Village include:

- **Land Status:** The land is part of the Green Belt and borders on AONB
- **Landscape / Use:** The site predominantly consists of high-quality arable land (Grade 2 and 3) that is in agricultural production. It also includes hedging and woodland and supports several public foot paths regularly used by the both the local community and people from further afield for recreational purposes.
- **Infrastructure:** There is no existing electricity or sewage infrastructure to support large scale development. This would have to be built from scratch at high cost
- **Services:** Development of several thousand houses will lead to substantial new demand for health services for which there are no existing facilities within Capel parish. Demand would likely fall on the adjacent Tonbridge and Malling (T&M) borough. Their facilities already experience very high demand and are unlikely to cope with large increases. Investment in new GP practices and other services are likely to be required.
- **Transportation (1 – on SS3):** Apart from 1-2 narrow winding tracks, there is currently no road infrastructure on the SS3 site. Bus services are limited / non existing. There are no cycle paths or walking paths connecting to Tonbridge. All would have to be built from scratch. Tudeley Road / B2017 which is the main East-West connection (to Tonbridge or Five Oak Green / Paddock Wood) is already heavily used with long tailbacks at the entrance to Tonbridge (especially at both roundabouts next to the Schools at Somerhill) during rush hour / school pick up times.
- **Transportation (2 – congestion):** Given the type of development envisaged at Tudeley Village, it is highly likely that this will predominantly cater for regular commuters to London who will want to use Tonbridge Station. There are currently no suitable bus services to / from Tonbridge station, and cycle and walking options are unrealistic. There will be a heavy reliance on cars leading to a large-scale increase in road traffic around the site. While expanding the B2017 (or building a new road) could conceivably allow faster traffic flow to / from Tonbridge – this is likely to come to a shuddering halt at the entrance to and cause gridlock in Tonbridge where there are no opportunities for widening the road network.
- **Heritage:** The site includes the All Saints Church – the only Church globally with Marc Chagall designed windows – which attracts regular international visitors and would not benefit from being surrounded by large scale development. It also includes the landowner's century old family graveyard. Strangely, neither is mentioned in the SHELAA assessment.
- **Other constraints:** The site is dissected by an existing railway line. This raises obvious concerns about how to adequately and safely connect north and south halves of the site. The only current connections are a small underpass in the middle of the site as well as bridge

over Hartlake Road on the site boundary. Both are single lane and not suitable for the anticipated traffic increase.

C.2. Critique of the TWBC's Sustainability Assessment for SS1 and SS3

We have already noted that we are in broad agreement with the sustainability appraisals ("SA") for most sites contained in the SHELAA documentation – unfortunately these seem to be wildly inconsistent with the assessments for SS1 / 3.

Sustainability Appraisal for Tudeley Village & Paddock Wood / East Capel

The Sustainability Appraisal of each site is based on assessing and determining a score against 19 sustainability objectives ("SO"). Scoring for each objective is supported by 2-5 detailed and specific decision-aiding questions. In total there are 62 sub-questions based on a set of specific criteria.

Working through these granular 62 sub-questions should result in a reasonably objective and transparent Sustainability Appraisal for each site.

TWBC has published two separate Sustainability Appraisals for Tudeley Village and Paddock Wood / East Capel. Both are high-level assessments at the 19 strategic objective level – there is no link to nor any evidence of an assessment at the 62 sub-question level for either site! Given the sites' primary importance for the Plan, this seems curious if not irregular.

Validating the Sustainability Appraisals for Tudeley Village and Paddock Wood / East Capel and considering the 62 sub-questions yields a fundamentally different outcome to TWBC's proposal in both cases: TWBC results appear to be entirely unreasonable and unsound.

For Tudeley Village - in summary at the 19 SO level (also see Figure 3 below):

- TWBC proposes 10 positive, 3 neutral and 6 negative scores
- A bottom-up assessment reveals 4 positive, 1 neutral and 14 negative scores

For Paddock Wood / East Capel - in summary at the 19 SO level (also see table below):

- TWBC proposes 10 positive, 3 neutral and 6 negative scores
- A bottom-up assessment reveals 3 positive, 3 neutral and 13 negative scores (for East Capel only)

We respectfully submit that TWBC's assessment of both sites is flawed, illogical and not defensible when assessing the underlying criteria.

On a side note: It is also curious that in TWBC's assessment both sites are rated with near identical scores across all criteria. While this is possible in theory, it is - given the differences between both sites - statistically-speaking highly unlikely in reality. We cannot prove and can only speculate on whether this is indicative of a pre-determined answer being approved due to its convenience. However, we can unequivocally state that TWBC's assessment of both sites is superficial and simply wrong.

Figure 3: Comparison of Sustainability Appraisals (TWBC vs. Save Capel)

Strategic Objectives		Tudeley Village STR/SS3		East Capel STR/SS1	
		<u>TWBC</u>	<u>Save Capel</u>	<u>TWBC SS1</u>	<u>Save Capel EC</u>
		<u>Assessment</u> (top-down based on 19 objectives)	<u>Assessment</u> (bottom-up based on 62 sub-questions)	<u>Assessment</u> (top-down based on 19 objectives)	<u>Assessment</u> (bottom-up based on 62 sub-questions)
1	Air	?	--	?	--
2	Biodiversity	0/-	---	0/-	-
3	Business Growth	+	0/+	+ / ++	0/+
4	Climate Change & Energy	-	---	- / --	---
5	Deprivation	+	--	+ / ++	-
6	Education	+ / ++	+	+ / ++	? / -
7	Employment	++	+	++	+
8	Equality	++ / +++	-	++	0/?
9	Health	++	-	++	--
10	Heritage	--	--	-	-
11	Housing	+++	++	+++	++
12	Land Use	-- / ---	---	-- / ---	---
13	Landscape	--	---	- / --	--
14	Noise	- / --	---	- / --	---
15	Resources	0 / +	0/?	0 / +	0/?
16	Services and Facilities	+++	- / --	++	-
17	Travel	++	---	+	0/-
18	Waste	0	-	0	0/?
19	Water	++/?	---	++/?	---

In summary, we believe the scoring methodology for SS1 and SS3 to be flawed and inconsistent with the rationale / criteria / logic employed in other SHELAA sustainability assessments. The actual scores for SS1 and SS3 should be predominantly negative or very negative as the site is entirely unsuitable for the development intended.

For a more detailed comparison and an evidence-based rationale for each score at the 62 sub-question level for both sites please see below.

C.3. Implications for the Sustainability of the Plan

The National Planning Policy Framework states (Feb 2019) that “Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”. These three objectives comprise an economic, a social and an environmental objective.

In their Non-Technical Note (SA p.5), TWBC explain that they conducted SA assessments for individual sites which were then grouped to allow a cumulative impact assessment at parish level and ultimately for the borough. It goes on to state that the “the key findings of this process were

that significant beneficial effects were expected for most economic and social sustainability objectives. The environmental objectives were found to produce either highly mixed, neutral or negative scores essentially reflecting the increased pressures that employment sites and a significant number of new dwellings would put upon sensitive environmental features such as landscape and heritage.”

This seems to indicate that even by their own assessment, the TWBC Local Plan falls short of the NPPF’s sustainability objectives.

As Tudeley Village and East Capel are such a critical part of the overall Local Plan – contributing over half of total housing need – any SA assessment for these two sites must be heavily weighted and strongly impact the sustainability of the overall Local Plan.

Given the flawed and unsustainable scoring for Tudeley Village and East Capel, this implies that TWBC are NOT following the NPPF requirement for a balance between economic, social and environmental aspects.

This Local Plan is therefore NOT SUSTAINABLE.

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel		
Air	1. Reduce air pollution	...help meet NO ₂ and PM ₁₀ targets along the A26 in Royal Tunbridge Wells?	HIGH Legislatively driven.	Consideration was given to what extent a development was likely to increase traffic in the AQMA (in the AQMA of neighbouring authorities)	?	--	-	Many school children likely to choose selective schools on A26
		...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options?		The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - or + >150 dwellings: -- or ++			--	1000s of extra houses built far from existing infrastructure. New residents will travel and lower air quality
		...promote forms of active travel including cycling and walking?		Desirable travel distances were considered. Where a site was within desirable walking distance, the following guide was implemented for residential dwellings: <50 dwellings: + >50, <150 dwellings: ++ >150 dwellings: +++ Where a site was not well located or outside of desirable walking distance, the following guide was implemented for residential dwellings: <1km - (<50 dwellings), -- (>50 dwellings) >1km - (<50 dwellings), --- (>50 dwellings) CIHT define desirable walking distances as follows: town centre = 200m commuting/school = 2000m elsewhere = 1200m			---	Most commuting, rail station and many schools and much commerce will be > than these distances due to remote setting
		...help reduce premature deaths from poor air quality (cause by PM _{2.5})?	HIGH Lives at stake.	Consideration was given to sensitive receptors.			-	
Biodiversity	2. Protect and enhance biodiversity and the natural environment	...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)?	MEDIUM Many sites are finite habitats	Undesignated habitat includes corridors, networks and linking routes. Consideration of whether a site would protect or improve a site of biodiversity value, or whether there is a risk of degradation or loss.	0/-	---	---	Remove 170 hectares mostly in agricultural use, within a rural landscape.
		...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations?	HIGH Ashdown Forest is of international significance	Consideration of whether likely significant effects will occur and whether effective mitigation is available (SANGS/SAMMS)			0	
		...support work to improve condition of SSSIs?	HIGH SSSIs are of national significance	Consideration of whether a site would protect or improve a SSSI, or whether there is a risk of degradation or loss. Impact Risk Zones are taken into account.			0	
Busin	3. Encourage business growth	...help support existing business and the growth of new businesses?		Consideration of the four reasons for business decline in the borough: broadband speeds, suitability of premises, useful transport links and availability of staff. In most cases the contribution of new customers to support existing business was considered insignificant.	+	0/+	+	

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel
ess Grow th	and competitiveness	...support growth of the local economy from professional and financial services, health and education, and construction-related activities.		Where construction services would be supported on a temporary basis only, no benefit was recorded.		+
		...prevent loss of economic floor space in preference for housing and other non-employment generating used within Key Employment Areas and other well-located employment sites (where appropriate)?		Scores adjusted to reflect the scale of economic floor space that would be lost or gained.		0
		...recognise and help develop the rural economy?		Impacts on rural economy from loss of agriculture not considered significant unless large scale losses were proposed.		-
Climat e Chang e & Energy	4.Reduce carbon footprint and adapt to predicted changes	...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures?		Small development (<50 dwellings) was deemed unlikely to provide significant adaptation. For larger development, benefits would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.		---
		...support reduction in carbon and energy so targets are consistently met?	HIGH Targets are currently not being met.	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: -- >500 dwellings: ---	-	---
		...support opportunities to utilise biomass in the borough?		Consideration was given to existing local air quality, with areas of poor air quality considered inappropriate locations for biomass. In other areas, benefits would depend on successful implementation of DM policy and development priorities. For this reason, an unknown score was often applied.		?
		...support opportunities to install community heating schemes?	LOW Opportunities are limited	Consideration was given to viability and practical constraints such as reliable heat sources. This sort of heating scheme is unlikely to be possible for small settlements.		---
Deprivati on	5.Reduce poverty and assist with regeneration	...address pockets of deprivation and encourage regeneration?		Regeneration was development in a location that is run-down and without purpose.	+	---
		...reduce rates of fuel poverty?		New dwellings would be built to more stringent energy efficiency standards than existing. However, they are likely to be unaffordable to lower income residents who may also suffer from fuel poverty so benefits unlikely to be seen. For this reason, most new development did not have an impact upon this issue.		0
	6.Improve educational	...meet demand for school places?		Consideration of local circumstances including the ratio of applicants to places at the nearest primary school (average taken for last 5 years) and scale of potential residential development.	+ / ++	+ / ++

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel		
Education	attainment and enhance the skills base	...continue to support a high proportion of highly qualified residents?		Consideration of the provision of adult education centres.			-	None noted in plan
Employment	7.Facilitate and support employment opportunities	...improve employment opportunities in key wards?	LOW Unemployment in borough is very low generally	Consideration of employment opportunities in terms of their provision, access via public transport and potential for developing new skills. Where job creation is likely, scores improve in wards with relatively high unemployment rates at present (St James and Sherwood). Many proposed development sites score a + to reflect the temporary jobs created by construction.	++	+	+	Doesn't support employment in key wards. Temp jobs in construction gets a +
Equality	8.Increase social mobility and inclusion	...improve physical activity rates for low income population groups?		Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.	++/ +++	-	0/-	Low income population won't live here
		...improve social mobility problems caused by selective grammar schools?		Fee paying schools were ignored in this consideration. The county council offers free transport to the nearest appropriate school over 3 miles. Thus 3 miles was used as a cut off. Where there was choice of non-selective schools within 3 miles, positive scores were applied. Where the nearest non-selective school was over 3 miles and one or more selective schools were closer by, negative scores were applied.			+++	There will be local non-selective schools
		...promote independent access to facilities for people with mobility, sensory and cognitive impairments?	HIGH Legislatively driven.	Independent access was considered possible where facilities could be reached safely without the use of a car. Desirable walking distances (see air quality objective above) were not applicable to this objective. Instead, distances of 1 mile or greater were considered inconvenient and scored negatively.			- / -	Limited facilities will be local, but most are remote >1 mile from TV
Health	9.Improve health and wellbeing, and reduce health inequalities	...meet demand for elderly care services?	HIGH Growing elderly population.	This objective considered the potential for C2 use.	++	+	--	No C2 provision in TV
		...improve physical activity rates for at risk population groups?		This objective was scored where high populations of at risk groups lived i.e. RTW, Southborough, Paddock Wood and Cranbrook. Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.			0/-	Would TV have high risk groups? Probably not
		...address pockets of health deprivation and specialist health needs?		Pockets of health deprivation have been recorded in Hawkhurst, Sandhurst, Benenden, Cranbrook, Pembury, Sherwood, Southborough, High Brooms, Rusthall, Broadwater and St James. Specialist health care needs included provision for cancer, mental illness, stroke and asthma sufferers.			--	TV won't help this
		...meet need for accessible green open space and recreation facilities for all?	HIGH TWBC is already behind on these standards	Scores applied depending on the extent to which a proposal or location meets all the ANG standards. Where none are met, the distance to, and size of, the nearest area determined how negative the score should be.			++	TV will have this
		...ensure residents can access heritage assets?		Consideration of accessibility related to provision (or lack of) pedestrian routes and new modes of travel or access routes.			+	Access to Church

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel		
Heritage	10. Preserve and enhance historical and cultural heritage assets	...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance?	HIGH Assets and settings are often finite or hard to restore once lost.	Scores reflected protection (or risk to protection) and the extent of harm or enhancement that would result.	--	--	--	
		...provide a framework for a positive heritage strategy including enhancements in line with NPPF?		This score was applied where specialist heritage advice identified opportunities.			?	
Housing	11. Provide sufficient housing to meet identified needs	...meet identified needs for affordable housing?	HIGH Housing demands are in borough are not being met.	The following guide was implemented for residential dwellings to reflect the high need in all locations: <50 dwellings: 0 50 - 150 dwellings: ++ >150 dwellings: +++	+++	++	+++	
		...meet demand for independently accessible housing and housing suitable for older people?	HIGH Housing demands are in borough are not being met.	Successful adoption and implementation of DM policy would determine whether housing is accessible. Housing suitable for older people considered safe distance to local facilities and services.			+	
		...meet demand for 2 and 3 bed market housing to suit expanding families?	HIGH Housing demands are in borough are not being met.	DM Housing Mix Policy would address this where it is relevant to local needs.			+++	
		...make allowances in housing targets due to environmental constraints in the borough?		Scores were applied to reflect whether the degree to which a high quantum of development was reduced to provide environmental protection.			---	This is clearly not the case and TWBC offered neighbour boroughs space
Land use	12. Protect soils, and reuse previously developed land and buildings	...protect Green Belt?		Consideration given to whether a policy would detract or respect/enhance the 5 purposes of the Green Belt.	--/ ---	---	---	
		...develop on previously developed in preference to greenfield land?		Positive scores were applied to policies that proposed development on brownfield land and negative to those on greenfield land (with consideration of scale of greenfield land lost and location of brownfield land).			---	
		...prioritise development on lower grade agricultural soils?		Consideration of the area of soils that are lost or protected where the loss or protection of >20ha of best and most versatile soils is scored as --- or +++ respectively.			---	170 ha lost land potential for 129 tonnes of blackcurrants, 265 tonnes of Bramley apples, 216 tonnes of pears, 207 tonnes of wheat, 155 tonnes of

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel		
								barley, 87 tonnes of oil seed rape and 175 tonnes of field beans
Landscape	13. Protect and enhance landscape and townscape	...protect and enhance the High Weald AONB and historic landscape?	Great weight as per NPPF	Consideration of risk to or protection of AONB features and the scale/setting/pattern of development.	--	---	---	
		...protect and enhance ancient woodland and provide opportunities for management of new and existing woodland that would benefit local and global environment, landscape, biodiversity, recreation, tourism, jobs, health & wellbeing, water quality, flooding?	HIGH AW is a finite habitat	Consideration of the risk to or protection of these features alongside availability of management opportunities. Includes a consideration of light pollution			---	
		...strengthen Green Infrastructure?					---	Only in so far as it is needed to get in/out of TV
		...protect and enhance landscape and townscape character and quality?		Judgement of whether impacts are likely to be adverse or positive and to what extent. Landscape character sensitivity also considered.			---	
Noise	14. Reduce noise pollution	...consider noise pollution in Important Areas for Road Noise?		Includes a consideration of both new noise generation and experience of existing noise by receptors. The following score guide was implemented for residential dwellings: Adjacent: - Adjacent and >100: - - Adjacent and >500: - - - DEFRA noise maps were viewed	- / -	---	---	>500
		...consider noise pollution from aircraft and trains?		Consideration of the extent to which residential development is located within the main Gatwick flight path or near to mainline railway, and the provision of mitigation to improve the existing situation.			---	Built around major rail line through centre of village!!
Resources	15. Reduce the impact of resource consumption	...prevent unsustainable demolition and rebuild projects?		The extent to which demolition of existing structurally sound development is required or prevented.	0 / +	0 / ?	0	
		...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding?		Responsible sourcing/low impact materials to be encouraged through policy. Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.			?	
		...support the contribution to the local economy from tourism?	LOW Tourism contributes a relatively small amount to local economy	The extent to which tourism is supported or discouraged by policy.	+++	- / -	0	No effect

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel	
Services and facilities	16.Improve access to and range of key services and facilities	...support superfast broadband connectivity in final 5% of the borough?	LOW Most locations now have reasonable speeds	Consideration of availability and speeds of broadband at appropriate local postcode.		+	May improve some rural
		...improve range of services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of availability of the 9 key services i.e. post office, convenience store, public house, doctor's surgery, primary school, secondary school, frequent bus service (hourly Mon-Sat), train station and supermarket. Scores applied as follows: 9 services: + 6-8 services only: - 5 service or less: - - 5 services or less and loss of existing: - - - More positive scores reflect provision of additional services.		-	Between 6-8 services. Clearly no train station
		...retail and leisure growth?		Leisure interpreted as including sports, cinema and restaurants. Scores reflect provision or removal of retail and leisure.		-	No cinema, restaurants TBD but likely limited, some sports but majority of existing retail leisure is distant and poorly accessible
		...improve access to services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of desirable walking distances and accessibility by various modes of transport. Where services can only be reached via private car, a - - - score is applied.		- -	Some local services and facilities but majority of existing are distant and poorly accessible
Travel	17.Improve travel choice and reduce the need to travel by private vehicle	...support priority transport projects?		Project identified in the borough's transport and cycling strategies.	++	?	Are strategies clear and reasonable?
		...prioritise easy access to train stations within and outside the borough?		3-5 miles or limited public transport: - 5-10 miles or very limited public transport: - - >10 miles or no public transport Positive scores reflect accessibility by various modes of transport for stations within 3 miles. Where a train station can be accessed conveniently and safely on foot a + + + score is applied.		- - -	Requires new roads through green belt to access with potentially 3-4,000 cars trying to access and bottlenecks to Tonbridge not considered in plan
		...improve rural bus services and retain viability of urban bus services?	LOW Bus users are generally low in borough	Consideration of whether a bus service would be improved or worsened by policy.		+	May improve demand for rural buses as site is remote from local towns
		...support opportunities for active travel including cycling and walking?		Same scoring method as for air quality.		- - -	Most commuting, rail station and many schools

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel
						and much commerce will be > than these distances due to remote setting
Waste	18.Reduce waste generation and disposal	...support continued decline in household waste reduction?		Proposed site allocation unlikely to make a significant difference to this objective.	0	0
		...improve rates of household waste diverted from landfill?		Outside the scope of proposed site allocations.		0
		...reduce construction waste?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.		--- Massive new construction, new additional roads required purely to access site
Water	19.Manage flood risk and conserve, protect and enhance water resources	...reduce water consumption rates?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.	++/?	? ---
		...manage impacts from flooding?		Improvements resulted in a positive score, maintaining the status quo or worsening impacts resulted in a negative score.		---
		...exacerbate flood risk on or off site?	HIGH Legislatively driven.	Consideration of flood zones and areas of flooding identified by the SFRA. Development in flood zone 1 was scored as + + + where the site did not feature on the 1 in 30 or 1 in 200 exceedance maps in the SFRA.		--- The FRA and prescribed drainage measures will limit the developable area. In addition, the location of the proposed main village centre and primary school is subject to frequent flooding from the main conveyance channel in the southern parcel. This is 'high risk' in EA surface water mapping. The Policy includes "mitigation measures to reduce the flood risk to particular residential areas in Five Oak Green". Development of this allocation would not directly influence the causes of flooding in FOG and such measures have

Sustainability Appraisal of Tudeley Village (SS3) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS3 TWB C	STR/ SS3 Reassessed by Save Capel
						not been specified. A Five Oak Green flood alleviation scheme has been proposed with the EA to reduce fluvial flood risk from the Alder Stream, but this has not been included in the PSLP.
		...support improvements in groundwater quality?		Consideration of groundwater sources protection zones and risk of their contamination.		SEW investigations into eight groundwater sources -within its WINEP report it identifies concerns of raw water quality deterioration from significant levels of nitrate and pesticides, metaldehyde and carbendazim. The Hartlake catchment is already at risk from nitrate and pesticides and the investigation found a significant relationship between groundwater levels in the river terrace gravels at the Hartlake site and River Medway levels and flows. Metaldehyde has been applied to the nearby neighbouring agricultural land surrounding the abstraction and high levels of metaldehyde concentrations have also been found in the River Medway.
		...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities?	HIGH Water stress in the region is severe	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: -- >500 dwellings: ---		---

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel		
Air	1. Reduce air pollution	...help meet NO ₂ and PM ₁₀ targets along the A26 in Royal Tunbridge Wells?	HIGH Legislatively driven.	Consideration was given to what extent a development was likely to increase traffic in the AQMA (or in the AQMA of neighbouring authorities)	?	--	0/-	
		...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options?		The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - or + >150 dwellings: - - or + +			--	Increased number of children travelling to grammar and other schools
		...promote forms of active travel including cycling and walking?		Desirable travel distances were considered. Where a site was within desirable walking distance, the following guide was implemented for residential dwellings: <50 dwellings: + >50, <150 dwellings: + + >150 dwellings: + + + Where a site was not well located or outside of desirable walking distance, the following guide was implemented for residential dwellings: <1km - (<50 dwellings), - - (>50 dwellings) >1km - - (<50 dwellings), - - - (>50 dwellings) CIHT define desirable walking distances as follows: town centre = 200m Commuting/school = 2000m elsewhere = 1200m			--	All housing in EC will be > 0.8 km from PW town centre. Some will be > 1.5 km but < 2 km Increased vehicle travel likely to increase air pollution
		...help reduce premature deaths from poor air quality (cause by PM _{2.5})?	HIGH Lives at stake.	Consideration was given to sensitive receptors.			?	
Biodiversity	2. Protect and enhance biodiversity and the natural environment	...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)?	MEDIUM Many sites are finite habitats	Undesignated habitat includes corridors, networks and linking routes. Consideration of whether a site would protect or improve a site of biodiversity value, or whether there is a risk of degradation or loss.	0/-	-	--	Removal of 200 acres of land in EC cannot enhance biodiversity/natural environment
		...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations?	HIGH Ashdown Forest is of international significance	Consideration of whether likely significant effects will occur and whether effective mitigation is available (SANGS/SAMMS)			n/a	
		...support work to improve condition of SSSIs?	HIGH SSSIs are of national significance	Consideration of whether a site would protect or improve a SSSI, or whether there is a risk of degradation or loss. Impact Risk Zones are taken into account.			n/a	
Busin	3. Encourage business growth	...help support existing business and the growth of new businesses?		Consideration of the four reasons for business decline in the borough: broadband speeds, suitability of premises, useful transport links and availability of staff. In most cases the contribution of new customers to support existing business was considered insignificant.	+ / ++	0 / +	0	Will compete with existing businesses in Capel and

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel		
Economic Growth	and competitiveness							PW
		...support growth of the local economy from professional and financial services, health and education, and construction-related activities.		Where construction services would be supported on a temporary basis only, no benefit was recorded.			0	
		...prevent loss of economic floor space in preference for housing and other non-employment generating used within Key Employment Areas and other well-located employment sites (where appropriate)?		Scores adjusted to reflect the scale of economic floor space that would be lost or gained.			0/+	
		...recognise and help develop the rural economy?		Impacts on rural economy from loss of agriculture not considered significant unless large scale losses were proposed.			0	Minor negative effect on rural economy with much-reduced agricultural land
Climate Change & Energy	4.Reduce carbon footprint and adapt to predicted changes	...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures?		Small development (<50 dwellings) was deemed unlikely to provide significant adaptation. For larger development, benefits would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.	-/-	---	---	A large housing development on agricultural land/ flood plain is a significant negative. Much of the land is zone 2 or 3 flood risk but has suffered serious flooding twice since 2015
		...support reduction in carbon and energy so targets are consistently met?	HIGH Targets are currently not being met.	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: -- >500 dwellings: ---			---	
		...support opportunities to utilise biomass in the borough?		Consideration was given to existing local air quality, with areas of poor air quality considered inappropriate locations for biomass. In other areas, benefits would depend on successful implementation of DM policy and development priorities. For this reason, an unknown score was often applied.			?	
		...support opportunities to install community heating schemes?	LOW Opportunities are limited	Consideration was given to viability and practical constraints such as reliable heat sources. This sort of heating scheme is unlikely to be possible for small settlements.			---	
Deprivation	5.Reduce poverty and	...address pockets of deprivation and encourage regeneration?		Regeneration was development in a location that is run-down and without purpose.	+ / + +	-	-	There is no evidence that EC is run down or deprived

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel		
on	assist with regeneration	...reduce rates of fuel poverty?		New dwellings would be built to more stringent energy efficiency standards than existing. However, they are likely to be unaffordable to lower incomes residents who may also suffer from fuel poverty so benefits unlikely to be seen. For this reason, most new development did not have an impact upon this issue.			0	
Education	6.Improve educational attainment and enhance the skills base	...meet demand for school places?		Consideration of local circumstances including the ratio of applicants to places at the nearest primary school (average taken for last 5 years) and scale of potential residential development.	+ / ++	? / -	?	Not sure how to establish additional number of children in EC and this will link with PW and proposed schools in both
		...continue to support a high proportion of highly qualified residents?		Consideration of the provision of adult education centres.			-	Site assessment sheets refer to Tun Wells providing this facility
Employment	7.Facilitate and support employment opportunities	...improve employment opportunities in key wards?	LOW Unemployment in borough is very low generally	Consideration of employment opportunities in terms of their provision, access via public transport and potential for developing new skills. Where job creation is likely, scores improve in wards with relatively high unemployment rates at present (St James and Sherwood). Many proposed development sites score a + to reflect the temporary jobs created by construction.	++	+	+	Doesn't support employment in key wards. Temp jobs in construction gets a +
Equality	8.Increase social mobility and inclusion	...improve physical activity rates for low income population groups?		Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.	++	0 / ?	?	Low income population unlikely to live here (?)
		...improve social mobility problems caused by selective grammar schools?		Fee paying schools were ignored in this consideration. The county council offers free transport to the nearest appropriate school over 3 miles. Thus 3 miles was used as a cut off. Where there was choice of non-selective schools within 3 miles, positive scores were applied. Where the nearest non-selective school was over 3 miles and one or more selective schools were closer by, negative scores were applied.			++	So will 2 additional P. schools within 3 miles not help? No grammar/fee paying schools in the area will result in more travel to neighbouring towns
		...promote independent access to facilities for people with mobility, sensory and cognitive impairments?	HIGH Legislatively driven.	Independent access was considered possible where facilities could be reached safely without the use of a car. Desirable walking distances (see air quality objective above) were not applicable to this objective. Instead, distances of 1 mile or greater were considered inconvenient and scored negatively.			--	Cannot establish what these additional facilities are or where sited. All distances will be >0.8 - <2km and the reality is that people do not walk
		...meet demand for elderly care services?	HIGH Growing elderly population.	This objective considered the potential for C2 use.	++	--	--	No evidence seen

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel		
Health	9.Improve health and wellbeing, and reduce health inequalities	...improve physical activity rates for at risk population groups?		This objective was scored where high populations of at risk groups lived i.e. RTW, Southborough, Paddock Wood and Cranbrook. Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.			---	Loss of rural/open public rights of way will result in people driving to open countryside.
		...address pockets of health deprivation and specialist health needs?		Pockets of health deprivation have been recorded in Hawkhurst, Sandhurst, Benenden, Cranbrook, Pembury, Sherwood, Southborough, High Brooms, Rusthall, Broadwater and St James. Specialist health care needs included provision for cancer, mental illness, stroke and asthma sufferers.			--	Development in EC will not assist
		...meet need for accessible green open space and recreation facilities for all?	HIGH TWBC is already behind on these standards	Scores applied depending on the extent to which a proposal or location meets all the ANG standards. Where none are met, the distance to, and size of, the nearest area determined how negative the score should be.			0	Accessible open space is reduced. Proposed sports pitches near A228 are for limited and specific sports. Putlands already exists and will require car use for most. Although open space is planned into the proposed development this is mitigation only
		...ensure residents can access heritage assets?		Consideration of accessibility related to provision (or lack of) pedestrian routes and new modes of travel or access routes.			+	ACCESS BADSELL MANOR
Heritage	10.Preserve and enhance historical and cultural heritage assets	...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance?	HIGH Assets and settings are often finite or hard to restore once lost.	Scores reflected protection (or risk to protection) and the extent of harm or enhancement that would result.	-	-	-	Badsell Manor – Grade 2 – will be surrounded by new development
		...provide a framework for a positive heritage strategy including enhancements in line with NPPF?		This score was applied where specialist heritage advice identified opportunities.			?	
Housing	11.Provide sufficient housing to	...meet identified needs for affordable housing?	HIGH Housing demands are in borough are not	The following guide was implemented for residential dwellings to reflect the high need in all locations: <50 dwellings: 0 50 - 150 dwellings: ++ >150 dwellings: +++	+++	++	++/ +++	Unclear whether affordable housing needs met

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel		
	meet identified needs		being met.					
		...meet demand for independently accessible housing and housing suitable for older people?	HIGH Housing demands are in borough are not being met.	Successful adoption and implementation of DM policy would determine whether housing is accessible. Housing suitable for older people considered safe distance to local facilities and services.				?
		...meet demand for 2 and 3 bed market housing to suit expanding families?	HIGH Housing demands are in borough are not being met.	DM Housing Mix Policy would address this where it is relevant to local needs.				++
		...make allowances in housing targets due to environmental constraints in the borough?		Scores were applied to reflect whether the degree to which a high quantum of development was reduced to provide environmental protection.				---
Land use	12. Protect soils, and reuse previously developed land and buildings	...protect Green Belt?		Consideration given to whether a policy would detract or respect/enhance the 5 purposes of the Green Belt.	-/- --	---		---
		...develop on previously developed in preference to greenfield land?		Positive scores were applied to policies that proposed development on brownfield land and negative to those on greenfield land (with consideration of scale of greenfield land lost and location of brownfield land).				---
		...prioritise development on lower grade agricultural soils?		Consideration of the area of soils that are lost or protected where the loss or protection of >20ha of best and most versatile soils is scored as --- or +++ respectively.				---
		...protect and enhance the High Weald AONB and historic landscape?	Great weight as per NPPF	Consideration of risk to or protection of AONB features and the scale/setting/pattern of development.	-/-	--	0	AONB 1.1 km to the south so 0

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel
Landscape	13. Protect and enhance landscape and townscape	...protect and enhance ancient woodland and provide opportunities for management of new and existing woodland that would benefit local and global environment, landscape, biodiversity, recreation, tourism, jobs, health & wellbeing, water quality, flooding?	HIGH AW is a finite habitat	Consideration of the risk to or protection of these features alongside availability of management opportunities. Includes a consideration of light pollution		-- Development will largely surround AW at Whetsted Woods (north and south of the railway)
		...strengthen Green Infrastructure?				
		...protect and enhance landscape and townscape character and quality?		Judgement of whether impacts are likely to be adverse or positive and to what extent. Landscape character sensitivity also considered.		-- Loss of GB open space and rural walks
Noise	14. Reduce noise pollution	...consider noise pollution in Important Areas for Road Noise?		Includes a consideration of both new noise generation and experience of existing noise by receptors. The following score guide was implemented for residential dwellings: Adjacent: - Adjacent and >100: -- Adjacent and > 500: --- DEFRA noise maps were viewed	- / -	--- More traffic on B2017 and A228 affecting EC
		...consider noise pollution from aircraft and trains?		Consideration of the extent to which residential development is located within the main Gatwick flight path or near to mainline railway, and the provision of mitigation to improve the existing situation.		--- Land in central FOG north of Badsell Rd rejected because of rail noise. EC development is north and south of the rail line
Resources	15. Reduce the impact of resource consumption	...prevent unsustainable demolition and rebuild projects?		The extent to which demolition of existing structurally sound development is required or prevented.	0 / +	0 Nothing to demolish
		...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding?		Responsible sourcing/low impact materials to be encouraged through policy. Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.		? ?

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel		
Services and facilities	16.Improve access to and range of key services and facilities	...support the contribution to the local economy from tourism?	LOW Tourism contributes a relatively small amount to local economy	The extent to which tourism is supported or discouraged by policy.	++	-	0	
		...support superfast broadband connectivity in final 5% of the borough?	LOW Most locations now have reasonable speeds	Consideration of availability and speeds of broadband at appropriate local postcode.			+	May improve rural?
		...improve range of services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of availability of the 9 key services i.e. post office, convenience store, public house, doctor's surgery, primary school, secondary school, frequent bus service (hourly Mon-Sat), train station and supermarket. Scores applied as follows: 9 services: + 6-8 services only: - 5 service or less: -- 5 services or less and loss of existing: --- More positive scores reflect provision of additional services.			0	No additional services seen in EC. Walks of 0.8 – 1.6km to existing facilities
		...retail and leisure growth?		Leisure interpreted as including sports, cinema and restaurants. Scores reflect provision or removal of retail and leisure.			-	Although PW sports facility is proposed adjacent to the A228 it will be limited to specific sport and not replacing Putlands which will remain the main sport centre
		...improve access to services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of desirable walking distances and accessibility by various modes of transport. Where services can only be reached via private car, a --- score is applied.			--	As most people in west PW use their cars to visit the town centre it would seem likely those living further away will do so.
		...support priority transport projects?		Project identified in the borough's transport and cycling strategies.	+	0/-	?	

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel
Travel	17.Improve travel choice and reduce the need to travel by private vehicle	...prioritise easy access to train stations within and outside the borough?		3-5 miles or limited public transport: - 5-10 miles or very limited public transport: - - >10 miles or no public transport Positive scores reflect accessibility by various modes of transport for stations within 3 miles. Where a train station can be accessed conveniently and safely on foot a + + + score is applied.		0 Rail station 0.9- 1.8 km on foot but most people will drive
		...improve rural bus services and retain viability of urban bus services?	LOW Bus users are generally low in borough	Consideration of whether a bus service would be improved or worsened by policy.		+
		...support opportunities for active travel including cycling and walking?		Same scoring method as for air quality.		-- EC development north and south of rail line and joined by a rural pedestrian crossing that is likely to see significant increase in footfall across the railway. Rural rights of way now through development
Waste	18.Reduce waste generation and disposal	...support continued decline in household waste reduction?		Proposed site allocation unlikely to make a significant difference to this objective.	0	0/? 0 ?
		...improve rates of household waste diverted from landfill?		Outside the scope of proposed site allocations.		0 ?
		...reduce construction waste?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.		? Construction of houses and estate roads?
Water	19.Manage flood risk and conserve, protect and enhance water resources	...reduce water consumption rates?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.	++/?	0 / - How is water consumption reduced?
		...manage impacts from flooding?		Improvements resulted in a positive score, maintaining the status quo or worsening impacts resulted in a negative score.		--- The SFRA assesses the proposed flood defence as increasing the flood risk notably, within the now proposed major residential part
		...exacerbate flood risk on or off site?	HIGH Legislatively driven.	Consideration of flood zones and areas of flooding identified by the SFRA. Development in flood zone 1 was scored as + + + where the site did not feature on the 1 in 30 or 1 in 200 exceedance maps in the SFRA.		--- Land is flood zones 2 & 3 – serious flood risk 1 in 100 years. The land has suffered significant flooding twice in the 5 years to 2020. The latest

Sustainability Appraisal of Paddock Wood / East Capel (SS1) – TWBC (Blue) vs. Save Capel (Green)

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations	SS1 TWBC	STR/ SS1 (East Capel only) – Reassessed by Save Capel
						Environment Agency flood maps I could find were 2012 and not updated per climate change
	...support improvements in groundwater quality?			Consideration of groundwater sources protection zones and risk of their contamination.		?
	...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities?	HIGH Water stress in the region is severe		The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: - - >500 dwellings: - - -		---

C.4. Sustainability Appraisal for Selected Alternative Sites

TWBC considered several other strategic sites that were – in our view mistakenly – ruled out earlier in the plan-making process.

As a result, TWBC did not conduct a sustainability appraisal for any of these sites. There are no published sustainability results, neither at the 19 SO nor at the 62 sub-questions level for any site.

Given the flawed assessment and poor sustainability scores for Tudeley Village and East Capel, Save Capel proposes for TWBC to reconsider some of these sites as potential alternatives. We also decided to reinvestigate, but due to our limited resources had to focus on 2 specific sites:

- Castle Hill: a late proposal also located in Capel parish that did not make it into the Reg19
- Blantyre House: one of the original strategic sites that was rejected during Reg 18

In summary at the 19 SO level (also see Figure 4 below):

- A bottom-up assessment for Castle Hill reveals 7 positive, 7 neutral and 5 negative scores
- A bottom-up assessment for Blantyre House reveals 8 positive, 6 neutral and 5 negative scores

A comparison to Tudeley Village and East Capel reveals that both of these alternative sites are far more sustainable and preferable. Castle Hill in particular feels like a more sustainable, direct replacement for Tudeley Village.

Figure 4: Sustainability Appraisal – Comparison of Tudeley Village vs. Alternatives

Strategic Objectives		<u>Tudeley Village</u> (bottom-up based on 62 sub-questions)	<u>Castle Hill</u> (bottom-up based on 62 sub-questions)	<u>Blantyre House</u> (bottom-up based on 62 sub-questions)
1	Air	--	-	-
2	Biodiversity	---	-	-
3	Business Growth	0/+	+	0/+
4	Climate Change & Energy	---	---	--
5	Deprivation	--	0	++
6	Education	+	0	0
7	Employment	+	++	+
8	Equality	-	++	-
9	Health	-	+/?	0
10	Heritage	--	0/-	+++
11	Housing	++	+++	++
12	Land Use	---	-	++
13	Landscape	---	--	++
14	Noise	---	-	0
15	Resources	0/?	0	+
16	Services and Facilities	-/-	+++	-
17	Travel	---	++	0/-
18	Waste	-	0	0
19	Water	---	0/?	0/?

We also strongly suspect that some of the other strategic sites such as Horsmonden would also turn out to be (far) more sustainable than Tudeley Village and / or East Capel if subjected to a detailed, objective review.

Unfortunately, this was not conducted by TWBC and Save Capel does not have the resources to replicate the analysis for all sites in time for Regulation 19.

For the assessment and an evidence-based rationale for each score at the 62 sub-question level for Castle Hill and Blantyre House please see below.

Sustainability Appraisal of Tudeley (SS3) vs. Castle Hill

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	SS3 TWBC	SS3 Save Capel	Castle Hill Appraisal (Save Capel)		
Air	1. Reduce air pollution	...help meet NO ₂ and PM ₁₀ targets along the A26 in Royal Tunbridge Wells?	HIGH Legislatively driven.	Consideration was given to what extent a development was likely to increase traffic in the AQMA (or in the AQMA of neighbouring authorities)	?	--	-	0	Unlikely to use A26
		...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options?		The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - or + >150 dwellings: -- or ++				--	Existing public transport, cycle / walk to High Brooms, local facilities
		...promote forms of active travel including cycling and walking?		Desirable travel distances were considered. Where a site was within desirable walking distance, the following guide was implemented for residential dwellings: <50 dwellings: + >50, <150 dwellings: ++ >150 dwellings: +++ Where a site was not well located or outside of desirable walking distance, the following guide was implemented for residential dwellings: <1km - (<50 dwellings), -- (>50 dwellings) >1km -- (<50 dwellings), --- (>50 dwellings) CIHT define desirable walking distances as follows: town centre = 200m commuting/school = 2000m elsewhere = 1200m				0	Adjacent to existing cycle paths. Some house within 2km to High Brooms station, majority slightly over. Much of it likely to be within 1200m of many North Farm amenities. Will have primary school. Mixed scores
		...help reduce premature deaths from poor air quality (cause by PM _{2.5})?	HIGH Lives at stake.	Consideration was given to sensitive receptors.				?	?
Biodiversity	2. Protect and enhance biodiversity and the natural environment	...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)?	MEDIUM Many sites are finite habitats	Undesignated habitat includes corridors, networks and linking routes. Consideration of whether a site would protect or improve a site of biodiversity value, or whether there is a risk of degradation or loss.	0/-	---	-	---	
		...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations?	HIGH Ashdown Forest is of international significance	Consideration of whether likely significant effects will occur and whether effective mitigation is available (SANGS/SAMMS)				0	
		...support work to improve condition of SSSIs?	HIGH SSSIs are of national significance	Consideration of whether a site would protect or improve a SSSI, or whether there is a risk of degradation or loss. Impact Risk Zones are taken into account.				0	
Business Growth	3. Encourage business growth and competitive	...help support existing business and the growth of new businesses?		Consideration of the four reasons for business decline in the borough: broadband speeds, suitability of premises, useful transport links and availability of staff. In most cases the contribution of new customers to support existing business was considered insignificant.	+	0/+	+	+	Close to many business

Sustainability Appraisal of Tudeley (SS3) vs. Castle Hill

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	SS3 TWBC	SS3 Save Capel	Castle Hill Appraisal (Save Capel)		
th	ness	...support growth of the local economy from professional and financial services, health and education, and construction-related activities.		Where construction services would be supported on a temporary basis only, no benefit was recorded.			0	?	
		...prevent loss of economic floor space in preference for housing and other non-employment generating used within Key Employment Areas and other well-located employment sites (where appropriate)?		Scores adjusted to reflect the scale of economic flood space that would be lost or gained.			+++	North Farm is a Key Employment Area	
		...recognise and help develop the rural economy?		Impacts on rural economy from loss of agriculture not considered significant unless large scale losses were proposed.			0		
Climate Change & Energy	4.Reduce carbon footprint and adapt to predicted changes	...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures?		Small development (<50 dwellings) was deemed unlikely to provide significant adaptation. For larger development, benefits would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.			---	Cannot help	
		...support reduction in carbon and energy so targets are consistently met?	HIGH Targets are currently not being met.	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: -- >500 dwellings: ---	-	---	---	---	
		...support opportunities to utilise biomass in the borough?		Consideration was given to existing local air quality, with areas of poor air quality considered inappropriate locations for biomass. In other areas, benefits would depend on successful implementation of DM policy and development priorities. For this reason, an unknown score was often applied.			?		
		...support opportunities to install community heating schemes?	LOW Opportunities are limited	Consideration was given to viability and practical constraints such as reliable heat sources. This sort of heating scheme is unlikely to be possible for small settlements.			---	Not in plan?	
Deprivation	5.Reduce poverty and assist with regeneration	...address pockets of deprivation and encourage regeneration?		Regeneration was development in a location that is run-down and without purpose.	+	--	0	-	Does not support regeneration but this land is not farmed, enjoyed, or usefully used beyond (important) biodiversity / greenness

Sustainability Appraisal of Tudeley (SS3) vs. Castle Hill

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	SS3 TWBC	SS3 Save Capel	Castle Hill Appraisal (Save Capel)		
	tion	...reduce rates of fuel poverty?		New dwellings would be built to more stringent energy efficiency standards than existing. However, they are likely to be unaffordable to lower incomes residents who may also suffer from fuel poverty so benefits unlikely to be seen. For this reason, most new development did not have an impact upon this issue.				+	>40% affordable accommodation with dedicated accommodation for PH medical staff
Education	6.Improve educational attainment and enhance the skills base	...meet demand for school places?		Consideration of local circumstances including the ratio of applicants to places at the nearest primary school (average taken for last 5 years) and scale of potential residential development.	+/++	?	0	+	Additional primary school
		...continue to support a high proportion of highly qualified residents?		Consideration of the provision of adult education centres.				-	
Employment	7.Facilitate and support employment opportunities	...improve employment opportunities in key wards?	LOW Unemployment in borough is very low generally	Consideration of employment opportunities in terms of their provision, access via public transport and potential for developing new skills. Where job creation is likely, scores improve in wards with relatively high unemployment rates at present (St James and Sherwood). Many proposed development sites score a + to reflect the temporary jobs created by construction.	++	+	++	++	Closer to key wards. Accessible
Equality	8.Increase social mobility and inclusion	...improve physical activity rates for low income population groups?		Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.	++/ +++	-	++	0/+	More likely to have lower income population due to NHS accommodation and affordable housing
		...improve social mobility problems caused by selective grammar schools?		Fee paying schools were ignored in this consideration. The county council offers free transport to the nearest appropriate school over 3 miles. Thus 3 miles was used as a cut off. Where there was choice of non-selective schools within 3 miles, positive scores were applied. Where the nearest non-selective school was over 3 miles and one or more selective schools were closer by, negative scores were applied.				+++	Numerous primary and non-selective schools within 3 miles including SKA primary and secondary
		...promote independent access to facilities for people with mobility, sensory and cognitive impairments?	HIGH Legislative driven.	Independent access was considered possible where facilities could be reached safely without the use of a car. Desirable walking distances (see air quality objective above) were not applicable to this objective. Instead, distances of 1 mile or greater were considered inconvenient and scored negatively.				++	Many North Farm facilities within 1-mile distance
	9.Improve health and	...meet demand for elderly care services?	HIGH Growing elderly population.	This objective considered the potential for C2 use.	++	0/+	+/?	?	Unknown
		...improve physical activity rates for at risk population groups?		This objective was scored where high populations of at risk groups lived i.e. RTW, Southborough, Paddock Wood and Cranbrook. Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.				?	Would it have high risk groups?

Sustainability Appraisal of Tudeley (SS3) vs. Castle Hill

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	SS3 TWBC	SS3 Save Capel	Castle Hill Appraisal (Save Capel)		
Health	wellbeing, and reduce health inequalities	...address pockets of health deprivation and specialist health needs?		Pockets of health deprivation have been recorded in Hawkhurst, Sandhurst, Benenden, Cranbrook, Pembury, Sherwood, Southborough, High Brooms, Rusthall, Broadwater and St James. Specialist health care needs included provision for cancer, mental illness, stroke and asthma sufferers.				--	Won't help this
		...meet need for accessible green open space and recreation facilities for all?	HIGH TWBC is already behind on these standards	Scores applied depending on the extent to which a proposal or location meets all the ANG standards. Where none are met, the distance to, and size of, the nearest area determined how negative the score should be.				++	Will have this
		...ensure residents can access heritage assets?		Consideration of accessibility related to provision (or lack of) pedestrian routes and new modes of travel or access routes.				+	Will increase accessibility to Historic Fort
Heritage	10. Preserve and enhance historical and cultural heritage assets	...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance?	HIGH Assets and settings are often finite or hard to restore once lost.	Scores reflected protection (or risk to protection) and the extent of harm or enhancement that would result.	--	--	0/-	-	Limited Affect
		...provide a framework for a positive heritage strategy including enhancements in line with NPPF?		This score was applied where specialist heritage advice identified opportunities.				+	Assume advice for Fort
Housing	11. Provide sufficient housing to meet identified needs	...meet identified needs for affordable housing?	HIGH Housing demands are in borough are not being met.	The following guide was implemented for residential dwellings to reflect the high need in allocations: <50 dwellings: 0 50 - 150 dwellings: ++ >150 dwellings: +++				++ +	
		...meet demand for independently accessible housing and housing suitable for older people?	HIGH Housing demands are in borough are not being met.	Successful adoption and implementation of DM policy would determine whether housing is accessible. Housing suitable for older people considered safe distance to local facilities and services.	+++	++	+++	++	Over 50's retirement scheme
		...meet demand for 2 and 3 bed market housing to suit expanding families?	HIGH Housing demands are in borough are not being met.	DM Housing Mix Policy would address this where it is relevant to local needs.				++ +	
		...make allowances in housing targets due to environmental constraints in the borough?		Scores were applied to reflect whether the degree to which a high quantum of development was reduced to provide environmental protection.				---	
	12. Protect	...protect Green Belt?		Consideration given to whether a policy would detract or respect/enhance the 5 purposes of the Green Belt.	--/ ---	---	-	0	Not in GB

Sustainability Appraisal of Tudeley (SS3) vs. Castle Hill

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	SS3 TWBC	SS3 Save Capel	Castle Hill Appraisal (Save Capel)		
Land use	soils, and reuse previously developed land and buildings	...develop on previously developed in preference to greenfield land?		Positive scores were applied to policies that proposed development on brownfield land and negative to those on greenfield land (with consideration of scale of greenfield land lost and location of brownfield land).				-	Loss of 53 Ha of greenfield is significant. less than TV. No current agricultural use lost.
		...prioritise development on lower grade agricultural soils?		Consideration of the area of soils that are lost or protected where the loss or protection of >20ha of best and most versatile soils is scored as - - - or + + + respectively.			--	Grade 3 and 4 agricultural land	
Landscape	13. Protect and enhance landscape and townscape	...protect and enhance the High Weald AONB and historic landscape?	Great weight as per NPPF	Consideration of risk to or protection of AONB features and the scale/setting/pattern of development.	--	---	---	---	
		...protect and enhance ancient woodland and provide opportunities for management of new and existing woodland that would benefit local and global environment, landscape, biodiversity, recreation, tourism, jobs, health & wellbeing, water quality, flooding?	HIGH AW is a finite habitat	Consideration of the risk to or protection of these features alongside availability of management opportunities. Includes a consideration of light pollution				-	No ancient woodland or significant trees lost. Strong efforts to mitigate
		...strengthen Green Infrastructure?						-	Will require relatively little additional infrastructure.
		...protect and enhance landscape and townscape character and quality?		Judgement of whether impacts are likely to be adverse or positive and to what extent. Landscape character sensitivity also considered.				-	Will not enhance but relatively hidden from most surrounding viewing points
Noise	14. Reduce noise pollution	...consider noise pollution in Important Areas for Road Noise?		Includes a consideration of both new noise generation and experience of existing noise by receptors. The following score guide was implemented for residential dwellings: Adjacent: - Adjacent and >100: - - Adjacent and > 500: - - - DEFRA noise maps were viewed	- / - -	---	-	---	
		...consider noise pollution from aircraft and trains?		Consideration of the extent to which residential development is located within the main Gatwick flight path or near to mainline railway, and the provision of mitigation to improve the existing situation.				+	Well to east of TW and GW westerly ops flight path. Does not have rail line through – small area bounds line
	15. Reduce	...prevent unsustainable demolition and rebuild projects?		The extent to which demolition of existing structurally sound development is required or prevented.	0 / +	0	0	0	

Sustainability Appraisal of Tudeley (SS3) vs. Castle Hill

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	SS3 TWBC	SS3 Save Capel	Castle Hill Appraisal (Save Capel)		
Resources	the impact of resource consumption	...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding?		Responsible sourcing/low impact materials to be encouraged through policy. Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.				?	
Services and facilities	16. Improve access to and range of key services and facilities	...support the contribution to the local economy from tourism?	LOW Tourism contributes a relatively small amount to local economy	The extent to which tourism is supported or discouraged by policy.	+++	-/-		0	
		...support superfast broadband connectivity in final 5% of the borough?	LOW Most locations now have reasonable speeds	Consideration of availability and speeds of broadband at appropriate local postcode.				+	May improve some rural
		...improve range of services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of availability of the 9 key services i.e. post office, convenience store, public house, doctor's surgery, primary school, secondary school, frequent bus service (hourly Mon-Sat), train station and supermarket. Scores applied as follows: 9 services: + 6-8 services only: - 5 service or less: - - 5 services or less and loss of existing: - - - More positive scores reflect provision of additional services.				++	Close to North Farm, High Brooms and accessible to TW and cycle path to Tonbridge.
		...retail and leisure growth?		Leisure interpreted as including sports, cinema and restaurants. Scores reflect provision or removal of retail and leisure.			+++	++	All North Farm easily accessible, cinema, sports, retail, restaurants and public transport to central TW
		...improve access to services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of desirable walking distances and accessibility by various modes of transport. Where services can only be reached via private car, a - - - score is applied.				++	As above
		...support priority transport projects?		Project identified in the borough's transport and cycling strategies.			++	---	++
								?	

Sustainability Appraisal of Tudeley (SS3) vs. Castle Hill

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	SS3 TWBC	SS3 Save Capel	Castle Hill Appraisal (Save Capel)		
Travel	17.Improve travel choice and reduce the need to travel by private vehicle	...prioritise easy access to train stations within and outside the borough?		3-5 miles or limited public transport: - 5-10 miles or very limited public transport: - - >10 miles or no public transport Positive scores reflect accessibility by various modes of transport for stations within 3 miles. Where a train station can be accessed conveniently and safely on foot a + + + score is applied.				++	
		...improve rural bus services and retain viability of urban bus services?	LOW Bus users are generally low in borough	Consideration of whether a bus service would be improved or worsened by policy.				+	
		...support opportunities for active travel including cycling and walking?		Same scoring method as for air quality.				++ +	Directly on cycle routes to TW and Tonbridge. Walk to North Farm.
Waste	18.Reduce waste generation and disposal	...support continued decline in household waste reduction?		Proposed site allocation unlikely to make a significant difference to this objective.	0	-/-	0	0	
		...improve rates of household waste diverted from landfill?		Outside the scope of proposed site allocations.				0	
		...reduce construction waste?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.				?	Massive new construction but relatively little new infrastructure
Water	19.Manage flood risk and conserve, protect and enhance water resources	...reduce water consumption rates?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.	++/?	--	0/?	?	?
		...manage impacts from flooding?		Improvements resulted in a positive score, maintaining the status quo or worsening impacts resulted in a negative score.				0/-	
		...exacerbate flood risk on or off site?	HIGH Legislative driven.	Consideration of flood zones and areas of flooding identified by the SFRA. Development in flood zone 1 was scored as + + + where the site did not feature on the 1 in 30 or 1 in 200 exceedance maps in the SFRA.				++ +	
		...support improvements in groundwater quality?		Consideration of groundwater sources protection zones and risk of their contamination.				?	
		...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities?	HIGH Water stress in the region is severe	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: - - >500 dwellings: - - -				- - -	

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
Air	1. Reduce air pollution	...help meet NO ₂ and PM ₁₀ targets along the A26 in Royal Tunbridge Wells?	HIGH Legislatively driven.	Consideration was given to what extent a development was likely to increase traffic in the AQMA (or in the AQMA of neighbouring authorities)	?	-	0	Not near the A26
		...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options?		The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - or + >150 dwellings: - - or + +			--	Extra car will travel on the existing roads to Cranbrook/ Staplehurst
		...promote forms of active travel including cycling and walking?		Desirable travel distances were considered. Where a site was within desirable walking distance, the following guide was implemented for residential dwellings: <50 dwellings: + >50, <150 dwellings: + + >150 dwellings: + + + Where a site was not well located or outside of desirable walking distance, the following guide was implemented for residential dwellings: <1km - (<50 dwellings), - - (>50 dwellings) >1km - - (<50 dwellings), - - - (>50 dwellings) CIHT define desirable walking distances as follows: town centre = 200m commuting/school = 2000m elsewhere = 1200m			---	Primary school 1.3 miles 2 Secondary schools 2.8 miles/ Cranbrook 3 miles Rail stations > 3 miles away so most journeys will be by car
		...help reduce premature deaths from poor air quality (cause by PM _{2.5})?	HIGH Lives at stake.	Consideration was given to sensitive receptors.			-	
Biodiversity	2. Protect and enhance biodiversity and the natural environment	...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)?	MEDIUM Many sites are finite habitats	Undesignated habitat includes corridors, networks and linking routes. Consideration of whether a site would protect or improve a site of biodiversity value, or whether there is a risk of degradation or loss.	0/-	-	-	Existing buildings on part of the site but to develop the whole site several green fields will need to be destroyed Infrastructure / road system does exist which will need enhancing
		...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations?	HIGH Ashdown Forest is of international significance	Consideration of whether likely significant effects will occur and whether effective mitigation is available (SANGS/SAMMS)			0	

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
		...support work to improve condition of SSSIs?	HIGH SSSIs are of national significance	Consideration of whether a site would protect or improve a SSSI, or whether there is a risk of degradation or loss. Impact Risk Zones are taken into account.			0	There are no sites of special interest near by
Business Growth	3. Encourage business growth and competitiveness	...help support existing business and the growth of new businesses?		Consideration of the four reasons for business decline in the borough: broadband speeds, suitability of premises, useful transport links and availability of staff. In most cases the contribution of new customers to support existing business was considered insignificant.	+	0/+	+	New customers for local businesses in Cranbrook
		...support growth of the local economy from professional and financial services, health and education, and construction-related activities.		Where construction services would be supported on a temporary basis only, no benefit was recorded.			+	
		...prevent loss of economic floor space in preference for housing and other non-employment generating used within Key Employment Areas and other well-located employment sites (where appropriate)?		Scores adjusted to reflect the scale of economic floor space that would be lost or gained.			+	Not a key employment area
		...recognise and help develop the rural economy?		Impacts on rural economy from loss of agriculture not considered significant unless large scale losses were proposed.			-	Loss of about 35 h of grade 2 agriculture land
		...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures?		Small development (<50 dwellings) was deemed unlikely to provide significant adaptation. For larger development, benefits would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.			-	Some of the land is already covered with concrete
Climate Change & Energy	4. Reduce carbon footprint and adapt to predicted changes	...support reduction in carbon and energy so targets are consistently met?	HIGH Targets are currently not being met.	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: -- >500 dwellings: ---	-	--	--	
		...support opportunities to utilise biomass in the borough?		Consideration was given to existing local air quality, with areas of poor air quality considered inappropriate locations for biomass. In other areas, benefits would depend on successful implementation of DM policy and development priorities. For this reason, an unknown score was often applied.			?	
		...support opportunities to install community heating schemes?	LOW Opportunities are limited	Consideration was given to viability and practical constraints such as reliable heat sources. This sort of heating scheme is unlikely to be possible for small settlements.			---	
		...address pockets of deprivation and encourage regeneration?		Regeneration was development in a location that is run-down and without purpose.			+++	Derelict buildings
	5. Reduce	...address pockets of deprivation and encourage regeneration?		Regeneration was development in a location that is run-down and without purpose.	+	++	+++	Derelict buildings

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
Deprivation	poverty and assist with regeneration	...reduce rates of fuel poverty?		New dwellings would be built to more stringent energy efficiency standards than existing. However, they are likely to be unaffordable to lower incomes residents who may also suffer from fuel poverty so benefits unlikely to be seen. For this reason, most new development did not have an impact upon this issue.			0	
Education	6.Improve educational attainment and enhance the skills base	...meet demand for school places?		Consideration of local circumstances including the ratio of applicants to places at the nearest primary school (average taken for last 5 years) and scale of potential residential development.	+/++	0	+	Assume 1 school
		...continue to support a high proportion of highly qualified residents?		Consideration of the provision of adult education centres.			-	Assume no adult education centre
Employment	7.Facilitate and support employment opportunities	...improve employment opportunities in key wards?	LOW Unemployment in borough is very low generally	Consideration of employment opportunities in terms of their provision, access via public transport and potential for developing new skills. Where job creation is likely, scores improve in wards with relatively high unemployment rates at present (St James and Sherwood). Many proposed development sites score a + to reflect the temporary jobs created by construction.	++	+	+	Doesn't support employment in key wards. Temp jobs in construction gets a +
Equality	8.Increase social mobility and inclusion	...improve physical activity rates for low income population groups?		Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.	++/ +++	-	0/-	Low income pop won't live here
		...improve social mobility problems caused by selective grammar schools?		Fee paying schools were ignored in this consideration. The county council offers free transport to the nearest appropriate school over 3 miles. Thus 3 miles was used as a cut off. Where there was choice of non-selective schools within 3 miles, positive scores were applied. Where the nearest non-selective school was over 3 miles and one or more selective schools were closer by, negative scores were applied.			++	There is a non-selective and a selective school within 3 miles in Cranbrook and I assume one school will be built
		...promote independent access to facilities for people with mobility, sensory and cognitive impairments?	HIGH Legislatively driven.	Independent access was considered possible where facilities could be reached safely without the use of a car. Desirable walking distances (see air quality objective above) were not applicable to this objective. Instead, distances of 1 mile or greater were considered inconvenient and scored negatively.			--	Assume some local facilities but most >1 mile
Health	9.Improve health and wellbeing, and reduce health inequalities	...meet demand for elderly care services?	HIGH Growing elderly population.	This objective considered the potential for C2 use.	++	0	--	Assume no provision residential care for the elderly
		...improve physical activity rates for at risk population groups?		This objective was scored where high populations of at risk groups lived i.e. RTW, Southborough, Paddock Wood and Cranbrook. Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.			+	Near Cranbrook so at risk population could potentially live here, development surrounded by countryside and development could have outdoor gym

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
		...address pockets of health deprivation and specialist health needs?		Pockets of health deprivation have been recorded in Hawkhurst, Sandhurst, Benenden, Cranbrook, Pembury, Sherwood, Southborough, High Brooms, Rusthall, Broadwater and St James. Specialist health care needs included provision for cancer, mental illness, stroke and asthma sufferers.			--	Assume development would not provide this
		...meet need for accessible green open space and recreation facilities for all?	HIGH TWBC is already behind on these standards	Scores applied depending on the extent to which a proposal or location meets all the ANG standards. Where none are met, the distance to, and size of, the nearest area determined how negative the score should be.			++	Surrounded by countryside and assume outdoor spaces will be provided
		...ensure residents can access heritage assets?		Consideration of accessibility related to provision (or lack of) pedestrian routes and new modes of travel or access routes.			+	Bus route to Cranbrook/ historic sites in Cranbrook i.e. church. Potentially footpaths could be provided at the side of the roads
Heritage	10.Preserve and enhance historical and cultural heritage assets	...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance?	HIGH Assets and settings are often finite or hard to restore once lost.	Scores reflected protection (or risk to protection) and the extent of harm or enhancement that would result.	- -	+++	+++	Brown field site -derelict buildings already exist
		...provide a framework for a positive heritage strategy including enhancements in line with NPPF?		This score was applied where specialist heritage advice identified opportunities.			0	
Housing	11.Provide sufficient housing to meet identified needs	...meet identified needs for affordable housing?	HIGH Housing demands are in borough and not being met.	The following guide was implemented for residential dwellings to reflect the high need in all locations: <50 dwellings: 0 50 - 150 dwellings: + + >150 dwellings: + + +	+++	++	+++	Assume 79 hectares approx. 2000 houses could be built if no other facilities are built
		...meet demand for independently accessible housing and housing suitable for older people?	HIGH Housing demands are in borough and not being met.	Successful adoption and implementation of DM policy would determine whether housing is accessible. Housing suitable for older people considered safe distance to local facilities and services.			+	Would assume that suitable houses would be built and some facilities
		...meet demand for 2 and 3 bed market housing to suit expanding families?	HIGH Housing demands are in borough	DM Housing Mix Policy would address this where it is relevant to local needs.			+++	Assume a number of 2-3 bedroom houses are built

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
			not being met.					
		...make allowances in housing targets due to environmental constraints in the borough?		Scores were applied to reflect whether the degree to which a high quantum of development was reduced to provide environmental protection.			---	Brownfield site and road structure in place not in GB
Land use	12. Protect soils, and reuse previously developed land and buildings	...protect Green Belt?		Consideration given to whether a policy would detract or respect/enhance the 5 purposes of the Green Belt.	- / ---	++	+++	Brown field site, improving the road system would not destroy GB and not adjacent to greenbelt
		...develop on previously developed in preference to greenfield land?		Positive scores were applied to policies that proposed development on brownfield land and negative to those on greenfield land (with consideration of scale of greenfield land lost and location of brownfield land).			+++	Building already present
		...prioritise development on lower grade agricultural soils?		Consideration of the area of soils that are lost or protected where the loss or protection of >20ha of best and most versatile soils is scored as - - - or + + + respectively.			--	Buildings exist but > 2h grade 2 farmland
Landscape	13. Protect and enhance landscape and townscape	...protect and enhance the High Weald AONB and historic landscape?	Great weight as per NPPF	Consideration of risk to or protection of AONB features and the scale/setting/pattern of development.	--	++	+++	Not near AONB
		...protect and enhance ancient woodland and provide opportunities for management of new and existing woodland that would benefit local and global environment, landscape, biodiversity, recreation, tourism, jobs, health & wellbeing, water quality, flooding?	HIGH AW is a finite habitat	Consideration of the risk to or protection of these features alongside availability of management opportunities. Includes a consideration of light pollution			+	Non protected land/ woodland. Would be an improvement as new houses would look better than the old prison
		...strengthen Green Infrastructure?					--	?
		...protect and enhance landscape and townscape character and quality?		Judgement of whether impacts are likely to be adverse or positive and to what extent. Landscape character sensitivity also considered.			++	The development is likely to be more attractive than the prison buildings
Noise	14. Reduce noise pollution	...consider noise pollution in Important Areas for Road Noise?		Includes a consideration of both new noise generation and experience of existing noise by receptors. The following score guide was implemented for residential dwellings: Adjacent: - Adjacent and >100: - - Adjacent and > 500: - - - DEFRA noise maps were viewed	- / - -	0	---	>500

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
		...consider noise pollution from aircraft and trains?		Consideration of the extent to which residential development is located within the main Gatwick flight path or near to mainline railway, and the provision of mitigation to improve the existing situation.			+++	No railway lines nearby and I don't think it is on a flight path
Resources	15.Reduce the impact of resource consumption	...prevent unsustainable demolition and rebuild projects?		The extent to which demolition of existing structurally sound development is required or prevented.	0/+	+	+	Assume redeveloped
		...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding?		Responsible sourcing/low impact materials to be encouraged through policy. Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.			?	
Services and facilities	16.Improve access to and range of key services and facilities	...support the contribution to the local economy from tourism?	LOW Tourism contributes a relatively small amount to local economy	The extent to which tourism is supported or discouraged by policy.	+++	-	0	
		...support superfast broadband connectivity in final 5% of the borough?	LOW Most locations now have reasonable speeds	Consideration of availability and speeds of broadband at appropriate local postcode.			+	Fibre is available in Cranbrook 3 miles away so I am sure it would be very easy to put into the development
		...improve range of services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of availability of the 9 key services i.e. post office, convenience store, public house, doctor's surgery, primary school, secondary school, frequent bus service (hourly Mon-Sat), train station and supermarket. Scores applied as follows: 9 services: + 6-8 services only: - 5 service or less: -- 5 services or less and loss of existing: --- More positive scores reflect provision of additional services.			-	Assume some services will be provided by not train station
		...retail and leisure growth?		Leisure interpreted as including sports, cinema and restaurants. Scores reflect provision or removal of retail and leisure.			-	Probably some retail provided but too small for cinema

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
		...improve access to services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of desirable walking distances and accessibility by various modes of transport. Where services can only be reached via private car, a - - - score is applied.			-	Walking distance of bus service
Travel	17. Improve travel choice and reduce the need to travel by private vehicle	...support priority transport projects?		Project identified in the borough's transport and cycling strategies.	++	0/-	0	Could have cycle path to Marden and Cranbrook
		...prioritise easy access to train stations within and outside the borough?		3-5 miles or limited public transport: - 5-10 miles or very limited public transport: - - >10 miles or no public transport Positive scores reflect accessibility by various modes of transport for stations within 3 miles. Where a train station can be accessed conveniently and safely on foot a + + + score is applied.			-	3.8 miles from Marden station and existing road structure
		...improve rural bus services and retain viability of urban bus services?	LOW Bus users are generally low in borough	Consideration of whether a bus service would be improved or worsened by policy.			+	Existing bus service that may be improved
		...support opportunities for active travel including cycling and walking?		Same scoring method as for air quality.			-	Remote approx. 3 miles from Marden and Cranbrook
Waste	18. Reduce waste generation and disposal	...support continued decline in household waste reduction?		Proposed site allocation unlikely to make a significant difference to this objective.	0	0	0	
		...improve rates of household waste diverted from landfill?		Outside the scope of proposed site allocations.			0	
		...reduce construction waste?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.			0	Some brownfield, limited roads addition
Water	19. Manage flood risk and conserve, protect and enhance water resources	...reduce water consumption rates?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.	++/?	0/?	?	
		...manage impacts from flooding?		Improvements resulted in a positive score, maintaining the status quo or worsening impacts resulted in a negative score.			0	
		...exacerbate flood risk on or off site?	HIGH Legislatively driven.	Consideration of flood zones and areas of flooding identified by the SFRA. Development in flood zone 1 was scored as + + + where the site did not feature on the 1 in 30 or 1 in 200 exceedance maps in the SFRA.			+++	Zone 1
		...support improvements in groundwater quality?		Consideration of groundwater sources protection zones and risk of their contamination.			?	

Sustainability Appraisal of Tudeley (SS3) vs. Blantyre House

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments/ Limitations	STR/ SS3 App E	Blantyre House assessed against Appendix B Rationale		
		...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities?	HIGH Water stress in the region is severe	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: -- >500 dwellings: ---			---	

D. Alternative Solutions

D.1. Rejected Sites Suggested for Review

How many sites submitted for development to TWBC SHELAA (Strategic Housing and Economic Land Availability Assessment) were rejected but, in view of the decision made to develop land in Capel, should be reconsidered?

Based on the SHELAA documentation, there was a total of 437 unique sites submitted for inclusion in the SHELAA process. Of these, 323 unique sites were rejected by TWBC.

In the light of TWBC's proposal to develop Tudeley Village, we reviewed a total of 90 'Rejected Sites' across a representative sample of 3 parishes (Capel, Pembury and Tunbridge Wells). The purpose of the review was to contrast the rationale for rejecting proposed sites versus the approval for SS3 / Tudeley Village in terms of consistency.

While we found ourselves in agreement with TWBC's assessments in a majority of cases, we also observed a striking inconsistency between the approval of Tudeley Village versus the rejection of a large number of sites.

As a result, **we strongly recommend for TWBC to review 43 'rejected' sites and to reconsider these for inclusion in the Plan INSTEAD of Tudeley Village.** Note that this includes sites located in the Green Belt / AONB that in an ideal world we would prefer not to develop at all. But given the need for affordable housing, the 43 sites suggested below are much preferable, better integrated into existing settlements and significantly less damaging to the environment than building at Tudeley Village.

In total, these 43 sites provide a developable area of 87 ha with a total incremental housing potential of ca. 2,270 units in three parishes alone. This is based on TWBC's proposed housing numbers and density estimates (which we believe are too low) for each site.

The parishes analysed account for ca. 50% of the total borough population. If extrapolating to the total borough, we would expect to find over 4,500 potential housing units that should be reviewed and reconsidered – and developed in preference to building Tudeley Village.

Disregarding the development proposal for SS3, the decision of rejecting these sites seemed appropriate. But as a result of then comparing them with building on large areas of Green Belt productive farmland we ask that the sites listed below should be reconsidered. Together they make a significant contribution towards the numbers of homes for TWBC's plans which should be considered as an alternative to building on open countryside.

We would ask TWBC to review its analysis and re-consider these 43 "rejected" sites for inclusion in the plan.

Figure 5: Rejected Sites proposed for Reconsideration – Overview by Parish

#	Parish	Save Capel Request to Review		
		Sites (#)	Developable Area (ha)	Housing (dwellings)
1	Benenden	0	0	-
2	Bidborough	0	0	-
3	Brenchley and Matfield	0	0	-
4	Capel	13	22	521
5	Cranbrook and Sissinghurst	0	0	-
6	Frittenden	0	0	-
7	Goudhurst	0	0	-
8	Hawkhurst	0	0	-
9	Horsmonden	0	0	-
10	Lamberhurst	0	0	-
11	Paddock Wood	0	0	-
12	Pembury	11	26	733
13	Royal Tunbridge Wells	19	38	1,013
14	Rusthall	0	0	-
15	Sandhurst	0	0	-
16	Southborough	0	0	-
17	Speldhurst	0	0	-
18	Outside borough boundary	0	0	-
	TOTAL	43	87	2,267

Figure 6: Rejected Sites proposed for Reconsideration – By Site

Site ref:	Site Address:	Parish / Location:	Developable Area (Rejected by TWBC)	Housing Yield if Residential (TWBC original figures)
11	Land at and to the rear of 50 Whetsted Road, Five Oak Green, TN12 6RT	Capel	1.62	49
48	Bramley House, Five Oak Green Road, Five Oak Green, Capel, TN12 6TJ	Capel	0.7	21
141	Site south of Badsell Road, Paddock Wood, TN12 6QR	Capel	0.33	Less than 10
143	Land at Tolhurst Road, Five Oak Green	Capel	0.7	21
156	Bracken Dale, Maidstone Road, Colts Hill, Capel, TN2 4AL	Capel	0.25	Less than 10
216	Land at Moat Farm, Whetstead Road, Five Oak Green	Capel	1.06	32
307	Land to the north of Badsell Road, Five Oak Green, Kent	Capel	3.79	114
329	School field, Finches Farm, Five Oak Green, Tonbridge, Kent	Capel	7.31	219
330	Finches Farm, Five Oak Green, Tonbridge, Kent	Capel	0.34	10 or less
331	Forstal Field, Finches Farm, Five Oak Green, Tonbridge, Kent	Capel	2.95	88
418	Capel Grange Farm, Badsell Road, Five Oak Green, Kent	Capel	1.45	44
453	Land off Hartlake Road, Tudeley, Tonbridge, Kent	Capel	0.69	21
Late site 10	Orchard Brook, Five Oak Green Road, Five Oak Green	Capel	0.67	20
28	Land on the eastern side of Woodside Road, Pembury, TN2 4BG	Pembury	0.89	27
64	Land at Woodside House, Woodside Road, Pembury TN2 4BG	Pembury	1.55	47
190	Land south east of Sandhurst Avenue, Pembury	Pembury	3.52	106
191	Land north of Henwoods Mount, Pembury	Pembury	3.19	96
208	Romford House Farm, Kings Toll Road, Pembury, TN2 4BE	Pembury	5.68	170
290	Abbots, Woodside Close, Pembury, Kent	Pembury	0.91	27
332	Priory Farm, Romford Road, Pembury, Kent	Pembury	5.77	173
354	Stone Court Farm, Stone Court Lane, Pembury, Kent	Pembury	1.95	59
367	Land to the southwest of Woodside House, Woodside Road, Pembury, Kent	Pembury	0.92	28
379	Land at Henwood Green Road, Pembury, Kent	Pembury	1.98	59
395 (Local Plan Allocation AL/PE7)	Woodsgate Corner, Pembury, Tunbridge Wells, Kent	Pembury		Not to be allocated for residential
91	RTA Joinery, Rear of 5 Birling Road, Tunbridge Wells, TN2 5LX	Royal Tunbridge Wells	0.23	Less than 10
99	Land at Pembury Road, Tunbridge Wells	Royal Tunbridge Wells	6.57	197
104	3 Lonsdale Gardens, Tunbridge Wells, TN1 1NX	Royal Tunbridge Wells	0.09	Less than 10 units
105	5 Lonsdale Gardens, Tunbridge Wells, TN1 1NX	Royal Tunbridge Wells	0.1	Less than 10 units
114	Land at Sandown Park, west of A21 Royal Tunbridge Wells TN2 4RT	Royal Tunbridge Wells	9.74	292
134 (overlap with site 175)	Land around Sandstone House, Longdrift, Court Lodge and Shallowdene, Broadwater Down, Royal Tunbridge Wells, TN2 5PE	Royal Tunbridge Wells	1.35	41
145; SALP AL/RTW13	WA Turner Factory Site, Broadwater Lane, Tunbridge Wells, TN2 5RD	Royal Tunbridge Wells	1.36	41
165	Pantiles Car Park, Major Yorks Road, Tunbridge Wells, TN2 5TP	Royal Tunbridge Wells	0.77	23
175 (overlaps with site 134)	Court Lodge & Land to the rear of Sandstone House, 44 Broadwater Down, Tunbridge Wells, TN2 5PE	Royal Tunbridge Wells	0.46	Less than 10 units
206	54a Culverden Down, Tunbridge Wells, TN4 9SG	Royal Tunbridge Wells	0.66	Less than 10 units
226	St Mark's Recreation Ground Frant Road Tunbridge Wells, TN2 5LS	Royal Tunbridge Wells	1.07	32
248 (SALP AL/RTW8)	Land at Rifle Range, Warwick Park, Royal Tunbridge Wells, TN2 5FD	Royal Tunbridge Wells	1	Less than 10 units
258	TN2 and adjacent land, Greggs wood Road, Sherwood, Tunbridge Wells.	Royal Tunbridge Wells	0.06	Less than 10 units
280	Land at The Midway, Nevill Court, Tunbridge Wells, Kent	Royal Tunbridge Wells	4.02	121
328	Land at Eridge Road & Eastlands Close, Royal Tunbridge Wells, Kent	Royal Tunbridge Wells	0.73	22
359 (this site also forms part of site 400)	Land to the east of Halliwell Nursing Home, Kingswood Road, Tunbridge Wells, Kent	Royal Tunbridge Wells	0.4	12
400 and including site 359	Land to the east of Halliwell Nursing Home, Kingswood Road, Tunbridge Wells, Kent	Royal Tunbridge Wells	2.97	89
411	Land at Sandown Park between Pembury Grange and A21, Royal Tunbridge Wells, Kent	Royal Tunbridge Wells	5.51	165

Note: Please find detailed rationale for re-consideration for each site in Appendix A.

D.2. Brownfield Potential

How many sites in the borough are available for development (brownfield and other categories) which are not registered on TWBC's system and what is their housing potential?

As of 2020, TWBC's existing Brownfield Register contains 38 sites with a total of 805 proposed dwellings. Of these, 30 sites have been permissioned. This would only yield a total of ca. 500 housing units from brownfield sites. In other words, currently **'brownfield' fails to make a meaningful contribution to the Plan.**

While the brownfield potential in the borough is constrained, we believe that the existing Register is far from complete and there is a MUCH larger brownfield potential that needs to be identified and evaluated as a priority BEFORE resorting to building on Green Belt / AONB land. We do not believe this effort has been undertaken to date.

As a result, we have conducted a survey to identify untapped brownfield potential. This report includes results of potential sites and the associated housing units for 4 parishes (Tunbridge Wells, Southborough, Speldhurst and Capel).

We urge TWBC to collaborate in this initiative to proactively identify brownfield potential / already developed sites with a poor use of space and to proactively engage landowners to contribute to the Plan.

Overleaf please find summary results for new, incremental Brownfield sites (for further site details including exact location and commentary, please see Appendix B):

Figure 7: New Brownfield Site List

Ref	Location	Parish	Size (hectares)	Potential Housing Yield at 30 dph
1	West of A21 half mile south of Kippings Cross roundabout	Brenchley & Matfield	13.0	390
2	North east of junction Sychem Lane and Alders Road	Capel	1.9	56
3	West of Whetsed Road, north of last dwelling, 400m from	Capel	0.6	18
4	North of Badsell Road, east of Orchard Business Centre	Capel	0.6	18
5	Capel Village Hall, Falmouth Place, Five Oak Green	Capel	0.2	5
6	Adjacent to Orchard Business Centre, Badsell Road, Five	Capel	0.1	3
7	Industrial building, Five Oak Green Road, opposite	Capel	0.1	2
8	West of A228 Maidstone Road opposite Capel Cottage	Capel	0.0	1
9	Kings Head Pub, Five Oak Green	Five Oak Green	0.1	2
10	Blantyre House	Goudhurst	5.7	172
11	Hawkwell Farmhouse, Maidstone Road	Pembury	0.3	8
12	Car Park of Tunbridge Wells Leisure Centre, Off St Johns	Southborough	0.7	21
13	Land next to 136 - 138 Speldhurst Rd	Southborough	0.4	13
14	Land + Garages between Sir David Park and Keel Gardens	Southborough	0.1	4
15	Langton Geen Village Hall Car Park, Speldhurst Road	Speldhurst	0.4	11
16	Colebrook Park, Land at A21 and Longfield Rd.	Tunbridge Wells	19.7	590
17	Land / Car park at Knights Park Leisure Park (140)	Tunbridge Wells	2.3	69
18	Off Birling Road - in Industrial Area	Tunbridge Wells	2.2	65
19	Sainsburys / Homebase - Car Park	Tunbridge Wells	1.5	45
20	South side of A264, Langton Road opposite All Saints	Tunbridge Wells	1.3	39
21	B&Q off Longfield Rd. - Car Park	Tunbridge Wells	1.1	34
22	Garage area at end of Birling Drive	Tunbridge Wells	0.8	24
23	Car Park at Culverden Square, off St Johns Road	Tunbridge Wells	0.7	20
24	Marks & Spencer / Halfords / Homesense, Off Dowding	Tunbridge Wells	0.6	19
25	AXA PPP office car park, corner of Camden Rd & Forest	Tunbridge Wells	0.6	17
26	Asda, Longfield Road - Car Park	Tunbridge Wells	0.5	15
27	Grass area between Elphicks place and Forest Road	Tunbridge Wells	0.5	14
28	John Lewis off Kingslanding Way - Car Park	Tunbridge Wells	0.4	12
29	Behind ABP, Broadwater Lane - Car Park	Tunbridge Wells	0.4	11
30	South side of Dowding Way and railway, accessed via lane	Tunbridge Wells	0.3	10
31	Tunbridge Wells Shopping Park off Longfield Rd (TK Maxx,	Tunbridge Wells	0.3	9
32	Baldwins Lane, north off North Farm Road, opp High	Tunbridge Wells	0.3	9
33	East of St Johns Rd TW near to sports centre on opposite	Tunbridge Wells	0.3	8
34	Wickes, Off Longfield Road - Car Park	Tunbridge Wells	0.2	7
35	Behind WA Turners in Broadwater Lane - Car Park	Tunbridge Wells	0.2	6
36	North east of junction North Farm Road, Chapman Way,	Tunbridge Wells	0.2	6
37	John St Car Park, just off west of St Johns Rd, opp side to	Tunbridge Wells	0.2	5
38	Car park in Camden Road, between Beulah Road and	Tunbridge Wells	0.2	5
39	Tunbridge Wells Royals Indoor Bowls Club - Car Park,	Tunbridge Wells	0.1	4
40	Tunnel Road	Tunbridge Wells	0.1	4
41	Car park in The Beeches (road) off Sandhurst Road, behind	Tunbridge Wells	0.1	4
42	Calverley Court Car Park, off Calverley Park Gardens	Tunbridge Wells	0.1	3
43	Linden Park Road, Tunbridge Wells - Car Park	Tunbridge Wells	0.1	3
44	Hobbycraft, Longfield Road - Car Park	Tunbridge Wells	0.1	3
45	The Old Coach Park, Linden Park Road - Car Park	Tunbridge Wells	0.1	3
46	Car Park off North Farm Road / Holmewood Rd	Tunbridge Wells	0.1	3
47	Beach St Car Park – off Beech St / Camden Road	Tunbridge Wells	0.1	3
48	Salvation Army Car Park, on junction between Bayall	Tunbridge Wells	0.1	2
49	Garden Street Car Park, off Camden Road	Tunbridge Wells	0.1	2

Note: For exact location details and commentary – please see Appendix B

To date, we have **identified 49 potential brownfield sites with an incremental housing potential of ca. 1,800 dwellings.**

This brownfield potential is based on only 4 out of 17 parishes, accounting for ca. 60% of the borough's population. Extrapolating for the total borough, this would lead us to **expect a total brownfield potential of ca. 3,000 incremental housing units.**

It should be noted that the housing figures stated above are based on a conservative density assumption of only 30 dwellings per hectare. Some of the sites included have the potential to cater for a much higher density – and thus more housing units - which we will cover in the next Section.

D.3. Increasing Housing Density

What is the additional housing potential that sites might offer if land is used more effectively?

The general standard for housing density that TWBC seem to have utilised in the Plan is 30 dwellings per hectare (dph). While this is in line with national planning guidelines, in the context of the proposed sacrifice of Green Belt land this strikes us as decidedly unambitious and unjustifiably low.

Given the announcement of a national climate emergency, it is imperative to make best use of finite land resources – this means to exploit (to be) developed land to its full potential and to conserve valuable agricultural and Green Belt land.

Developing at higher densities would sharply increase the housing yield per hectare thereby reducing the need to build on greenfield land.

This especially applies to Tudeley Village where the proposed densities of 15-30 dph are very low, effectively gobbling up a much larger amount of Green Belt land than needed. On a side note: This also indicates that the intention for this site is not to build affordable housing (the real local need) but to provide executive homes for London commuters.

The following sections and figures show how increased housing densities can more easily satisfy the stated housing requirements. While this simulation is by necessity based on top-down estimates - and may not be desirable / feasible in many cases - it clearly illustrates the vast opportunity to increase housing yield through increased density, thereby foregoing the need to sacrifice scarce Green Belt land. See Appendix E for a summary of methodology used.

(1) SHELAA sites rejected by TWBC but we feel should be reconsidered.

Increasing density for the 43 rejected sites that should be reconsidered (see Section D1) to 40 or 50 dwellings per hectare, would yield additional housing of 1,000 to 1,900 units respectively.

These include windfall sites rejected by TWBC, but we felt should be reviewed because even though they fall below the 0.25h threshold they still represent a contribution to the overall housing numbers and there are developers who specialise in these smaller sites.

Figure 8: Housing Potential / Density Elasticity for Rejected Sites (Selected Parishes)

#	Parish	Dwellings - Density Elasticity		
		Rejected Dwellings at Original Density	Rejected Dwellings if increasing density to c. 40 dph	Rejected Dwellings if increasing density to c. 50 dph
1	Benenden	521	859	1,073
2	Bidborough			
3	Brenchley and Matfield			
4	Capel			
5	Cranbrook and Sissinghurst			
6	Frittenden			
7	Goudhurst			
8	Hawkhurst			
9	Horsmonden			
10	Lamberhurst			
11	Paddock Wood			
12	Pembury	733	1,056	1,320
13	Royal Tunbridge Wells	1,013	1,422	1,773
14	Rusthall			
15	Sandhurst			
16	Southborough			
17	Speldhurst			
18	Outside borough boundary			
	TOTAL	2,267	3,336	4,167

(2) Brownfield and other sites that we have located

When reviewing the newly identified 49 brownfield sites (see Section D2) – these currently yield ca. 1,800 units at 30 dwellings per hectare. Increasing density to 40 or 50 dph which is possible for a number of these sites would generate an additional 600 to 1,200 housing units.

And as stated above this analysis only covers a subset of the total borough so we would expect there to be further upside.

Figure 9: Housing Potential / Density Elasticity for newly identified BF sites

Newly Identified BF Sites	Dwellings at 30 dph	Dwellings if increasing density to 40 dph	Dwellings if increasing density to 50 dph
New Sites	1,793	2,391	2,988

There is clear opportunity to achieve higher housing yields, to optimise the use of land and to decrease the need to build on Green Belt by a moderate increase in housing density.

D.4. Alternative Housing Solutions

In this Section we would like to expand on the topic of how to achieve TWBC's housing target through alternative solutions than building on Green Belt land. In the section we will return to the topic of housing density, cover a better use of car parks and then turn to a number of specific locations which we believe hold a large housing potential.

THE CASE FOR DENSITY

TWBC's 'Distribution of Development Topic Paper' was encouraging in its examples of locations where it had increased density from the original number of dwellings proposed in planning applications, and apparently had taken steps to encourage higher density by various means. However, we have found numerous instances where density of housing throughout the borough could be increased from the 30 dwellings per hectare (dph) to 40 or even 50 dph without compromising the acceptability to the occupants.

The Garden Village concept was an admirable one, at the time of its introduction at the beginning of the 20th century. One of its main attributes was **that** of space: wide, tree-lined boulevards, large gardens front and back, for families to grow their own home-grown vegetables.

A century later, we are running out of space, as confirmed by the wish of TWBC to use valuable agricultural land to resolve the problem of housing required in anticipation of an increase in population / households. The issue of needing that land to feed the increasing population does not seem to have been taken into consideration.

Land is now a luxury and needs to be used much more efficiently and carefully.

It is therefore encouraging to see that there are locations both in nearby boroughs and in our own, where these higher densities are successfully being used.

- In Tunbridge Wells a new estate is being built with luxury homes, a feeling of spaciousness, and a density of 40dph.
- Another group of buildings in Tunbridge Wells has recently been built at 68dph.
- In Tonbridge, there is an estate part of which attractively fronts onto the river, which takes up 1.27ha with 97 dwellings which gives a density of 76dph – excluding the flats at the entrance to the estate.
- Again, in Tonbridge, again adjacent to the river, are flats with a density of 100dph.

In Section 3, we have demonstrated that by merely increasing from 30 to 50dph a significant number of dwellings can be built upon the SHELAA sites submitted to TWBC.

The Plan includes a majority of estates being built at low densities: there is plenty of housing stock available of that size, but a constant (local) demand seems to be there for affordable housing. By that it is not meant homes that are part of a scheme, but simply homes that can be bought conventionally, with a mortgage as the first step on the ladder.

There are figures which indicate a significant number of young – and no longer so young – people who cannot afford to move out their parents' homes.

Similarly, the numbers of people getting divorced is significant and many of those need to downsize.

Equally there are plenty of people who have retired, or their families grown up and left the home and the parents wish to downsize.

As a result, a general increase in density of housing would seem to mitigate many of the demands of housing in the borough.

In fact, this is encouraged by the NPPF: in section 11: Making Effective Use of Land, in item 123(a) on page 37 is specifies 'plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This . . . should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development ...' There is every reason to include rural locations too because they often have pockets of high density, for example traditional terraces of farmworkers cottages. There is even more reason not to waste space in a rural location.

CAR PARKS

In addition, it seems to be traditional that car parks generally must be visible to all. The floor space of retail units is greatly increased by the space required for open air car parks.

It is acknowledged that the car rules all and there is a strong feeling that its presence is too much of a significant part of the visual scene, in addition to taking up valuable space.

For future retail developments it would be far more effective to require car parking to be beneath instead of next to retail units. This would improve the shopping experience for shoppers because they would no longer be exposed to all weather conditions simply to go shopping. In eliminating surface car parks, shops could be closer together, enabling an indoor mall concept which seems to work well in town centres. In doing this, more retail units could be built within the area allocated.

Existing retail car parks could have accommodation built above the space, releasing pressure on the housing need. The car parking would be retained, and residents would be in a prime location, reducing the need to actually have a car. While construction is taking place, it would be possible for a temporary structure adding a second floor to be located in the other part of the car park so that parking spaces are not reduced.

With that in mind, it was interesting to note that car parking was likely to be reduced by a possible retail development in Tunbridge Wells:

The SHELAA site number 140, at Knights Park, in its Sustainability Assessment says: "A slight positive score for Air reflects the probability that intensification of leisure use will involve loss of some parking spaces thus forcing users to consider the alternative modes of transport that already exist and would be further improved by this allocation".

As a side issue, there are few existing alternative modes of transport that are suitable.

For residents of Five Oak Green, there are no direct buses that serve Knights Park.

A minority of Five Oak Green inhabitants might be prepared to wait for a bus, travel slowly to a bus stop, get off, wait for the next bus and catch that: or perhaps to cycle, but those figures would be low indeed. The same would no doubt apply for residents of the proposed SS3 development.

Therefore, parking is and will continue to be needed and requires space. This is a good example where the parking can be retained with a building above the car park.

In response to the desperation that forces TWBC to consider building houses upon open countryside, measures need to be put in place to consider surface car parks as residential potential (building above to retain the car parks).

This would be in line with the NPPF Para 11: Making Effective Use of Land (page 35) item 118(d): ‘promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)’ plus a footnote ‘As part of this approach, plans and decisions should support efforts to identify and bring back into residential use empty homes and other buildings, supported by the use of compulsory purchase powers where appropriate.’

Combining car parks with residential, or where appropriate commercial or leisure, would solve multiple issues, including the policy mentioned in the TWBC Parking Strategy document to improve parking provision.

POTENTIAL IN SPECIFIC LOCATIONS

There are several sites in the borough with exceptional potential for development – both local to Tunbridge Wells and further removed. Below we explore a number of selected sites that we believe could make a significant and yet untapped contribution to achieving the Plans’ housing ambition.

1. Blantyre House

Looking at the specification for Garden Villages, one of the criteria seems to be that it should ideally be separate from neighbouring large towns.

The former Blantyre Prison fits that particular requirement and is of a reasonable size, especially if considered in conjunction with the neighbouring SHELAA site number 325 which is in the Cranbrook and Sissinghurst parish. At the nearest point they are only 300m apart.

As far as we can tell the property is owned by TWBC or the government and seems to be 77ha. Site 325 is about 40ha developable area, so that totals 117ha. At a density of 30 dph that offers 3,510 dwellings.

SS3’s potential yield is 2,500-2,800 so there is room for SS3 plus some of East Capel, at Blantyre / site 325, at just 30dph.

Staplehurst Station is 11 minutes’ drive away, with its connection to Ashford International and the high-speed rail link to London and also the continent. Cranbrook is 10 minutes’ drive away.

However, Blantyre has at this stage *not* been included in TWBC’s allocations despite, according to their report in the Distribution of Development Topic Paper, page 22:

- 'Location has the benefit of being outside of some key constraints and is within reach of the mainline rail at Staplehurst'

Because:

- 'However, the scale of site was too small and the site was not submitted in the call for sites and thus this option did not become available for appraisal.' (At this stage, the prospective Tudeley site, now known as SS3, had not been submitted to the SHELAA scheme either.)

There is no mention of the neighbouring SHELAA site 325, despite the potential together with Blantyre outlined above.

So even though the site is owned by the government, borough council, other government associated bodies or combinations thereof, i.e. it is public land, it has not been offered up as a solution to the borough council / government's housing problems.

As pointed out in NPPF page 35 paragraph 119, 'Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.'

It would no doubt be possible for the two sites to become a unit without losing too much of the woodland west of Roundgreen Lane. However, if it was deemed unworkable because of the separation between the two sites, that in fact would equally apply to the SS3 Capel site which is divided very effectively by the railway.

2. East Pembury

Referring to the illustration below, site 375 in green has been approved by TWBC.

However, site 190 was not approved even though it was just the other side of the Hastings Road. It seems logical to include 190 in the TWBC Plan because it is a natural infill and accessible directly from the A21.

Sites 191, 208, 290, 28, 64, 332, 367 are individually remote, accessing only onto unsuitably narrow Woodside Road, and Romford Road for 332.

However, if access is possible between sites 190 and 191 it would be feasible to connect these sites to the others above with a spinal road connecting them all (see the blue line in Figure 10 below).

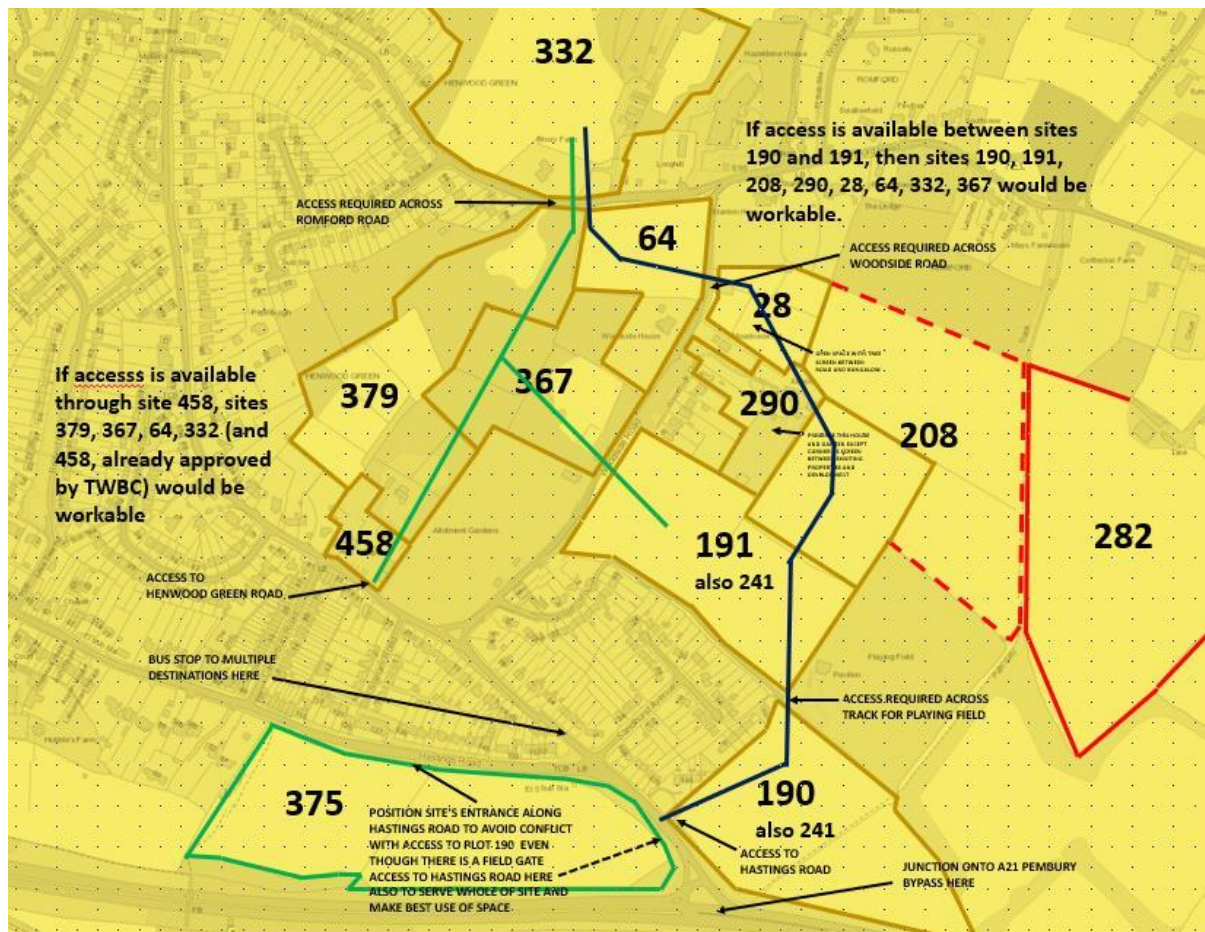
This also applies to the group comprising 379, 367, 64, 332 (and 458 already approved by TWBC). If they are all available, they could access (see green line) via 458 onto Henwood Green Road.

If the eastern bloc was not workable via sites 190, 191, etc. it might be accessible via 458, depending on whether it was felt that Henwood Green Road would have the capacity to cope with additional number of houses. Or the same could work in reverse if access via site 458 on Henwood Green Road was not possible.

Sites at this location would have immediate access to the A21 meaning that most traffic would exit from the development at this point, even traffic heading northwards beyond Pembury, because it would no doubt be faster to route along the A21 and then the A228 Northern Pembury Bypass than cutting through Pembury itself.

The total allocation for these sites according to SHELAA documents totals 674 dwellings.

Figure 10: Draft Proposal for Eastern Pembury sites working in conjunction



3. Pembury Road, Sandown Park

Close to the western side of the A21 / A264 junction, on the northern side of Pembury Road are sites 99, 411 and 144. Once again, if these work in conjunction with a road combining all three, or at least two of them, either from Sandown Park or preferably from the A264 so that traffic to/from the development has direct access to the A21, these three sites combined would offer 654 dwellings according to the SHELAA documents.

These sites combined would offer even better access than the eastern Pembury sites to the A21, the A264 and to Tunbridge Wells (via bus, bike and on foot).

4. A21/A264, Tesco Site

On the eastern side of the A21 / A264 junction is the Tesco supermarket site which was initially proposed for one of the termini for a Park and Ride scheme. A feasibility study was instigated by TWBC but discounted on the basis that it would require too great a subsidy to be worthwhile considering. In researching the documentation, it seems unlikely that an express bus service from Pembury to Tunbridge Wells (i.e. non-stop to / from Tunbridge Wells centre from the proposed park and ride site) was considered, serving not only a park and ride at the Tesco site but the approved SHELAA sites along the A21 totalling 260 properties at TWBC predicted numbers in addition to Pembury village itself.

Offering car parking space for the 'park and ride' would also provide the opportunity to build above the car park - one or two storeys – which would have been an ideal location for commuters by car, having direct access to the A21 and A264.

In addition, even having dismissed the 'park and ride' scheme, the site would still have been ideal for residential purposes for the above reasons.

The site is of 4.78ha. At a housing density of TWBC's standard figure of 30 dph, there is potential for 143 dwellings. At 40dph, 191 and at 50dph, 239. If four storey flats of 50 sqm were constructed with parking for occupants on the ground floor, these could potentially supply 600 apartments in a key location immediately accessible to an excellent road infrastructure. When compared to the proposed SS3 in the middle of green fields with currently no infrastructure for access, this seems an excellent choice of site for residential purposes.

Instead, the site is in an advanced stage of the planning permission process for a car sales showroom (when there are already more than adequate choices available in this market)

5. Liptraps Lane, near to High Brooms Railway Station

Even more local to Tunbridge Wells, site number 238, the Sports Field off Liptraps Lane has a developable area of 3.92ha, out of a gross 4.22ha. The predicted yield is 60 dwellings. At the usual 30 dph density this indicates that half the playing field will be retained. If that is the case, increasing to 50dph would substantially increase the area of land remaining for leisure use.

Alternatively, making the most of the 2 ha representing half the area, 50dph would increase the yield to 100 dwellings.

However, being right next to High Brooms Station, a 5 minute walk away along Clifton Road and up the footpath to the station, this would be an ideal location for commuters, and this could justify the higher yield that a series of apartment buildings would produce.

In the lower field alone, three blocks of 50 sqm apartments over 3 floors plus parking at ground level would yield 126 apartments in 0.5ha, a density of 252 dph.

In this lowest field, the buildings would not be close to the dwellings at the south or east of the field; the north would be unlikely to be visible from the road and the west elevation would face the railway and industrial estate beyond. For this reason, the height could probably extend beyond four storeys.

If a second series of apartments were placed in the centre field that would double the yield to 252 dwellings, from an original anticipated number of 60.

6. Former Gasworks in Sandhurst Road

SHELAA site reference SALP AL/RTW10, the former gasworks site in Sandhurst Road, has been approved for development and it is encouraging to see that at a size of 1.78h the anticipated yield would be 170 dwellings, a density of about 95dph. That compares with the estate in Tonbridge mentioned earlier and would anticipate a similar arrangement with conventional town houses, hopefully with parking of cars beneath the dwellings to maximise leisure space for residents.

There is more potential on this site however.

Like the playing field above, it is convenient to High Brooms Station, a 2 minute walk in fact from its nearest point. Due to the neighbouring houses, the buildings on the outer edge of the development should not be overbearing, but in the central part similar figures could be produced to the playing field with a series of flats, so that would be 126 dwellings in the apartments at 252 dph in the central part plus the outer edges at 95 dph which would produce 121 dwellings: so 373 apartments compared to the original 170 dwellings.

Traffic from these sites would be anticipated to be lower than for locations in the countryside or outskirts of Tunbridge Wells due to the proximity of transport infrastructure such as High Brooms Railway Station and nearby buses. There are cycle lanes, and it would be a half hour walk to the Victoria shopping centre.

Taking into account the employment situation in this ward, these two developments might be considered large enough to justify small shops to serve this community and the neighbouring area and could also incorporate other services such as a surgery, which would provide employment locally. In addition, some of the space available could be devoted to offices instead of residential, which would similarly provide work for local people.

7. SHELAA site numbers 57, 101 and 43 (southern part south of woodland) comprising the Colebrook Estate, located north of Longfield Road, east of Kingstanding Way.

The development for this group of sites consists of various commercial proposals none of which appear to have included residential factors.

This is a large site and ideal for residential purposes for the following reasons:

- Infrastructure is in place.
- Together they offer a site with access both to Longfield Road and to the A21 directly onto the slip road which makes an ideal entry/exit for traffic for the site, without affecting Longfield Road.
- In this prime position adjacent to A21 commuter traffic for north, east, southward directions would not need to affect Tunbridge Wells.

In addition:

- Bus service into Tunbridge Wells for local commuters to Tunbridge Wells to the train stations

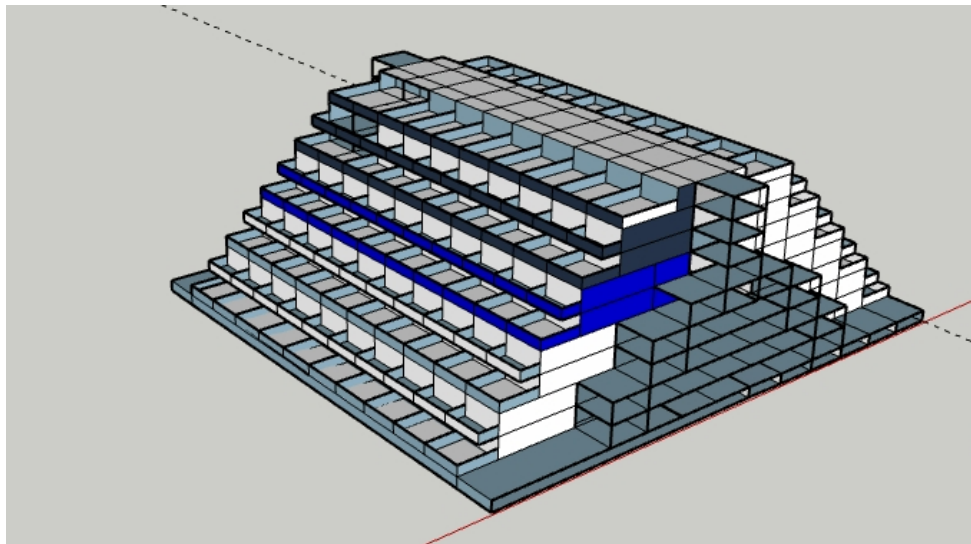
- Trains to London and the coast from High Brooms, within bus / cycle / walking distance
- Large food supermarket within bus / cycle / walking distance
- Wide range of other shops and leisure facilities within bus / cycle / walking distance
- Tunbridge Wells centre within bus / cycling distance: even walking is not unrealistic at 50 minutes.
- Site 57 has a developable area of 16.91ha, site 101 6.98ha and the southern part of 43 7.16ha: 32.05ha. At 30 dph that's 960, at 40 dph 1200, at 50 dph 1500 dwellings.
- With the sloping site the lower parts adjacent to the industrial estate on Kingstanding Way would suit apartments of perhaps six storeys.
- The visual concerns of a series of tall structures would be not significantly greater than the very visible roofs of the neighbouring industrial estate.

The site actually offers an exciting opportunity for a different type of accommodation which although not common, can be built using conventional methods – a Hybrid Building. Basically, a row of ten terraced houses, single or twin storeys, with a patio area. On top, another row, of the same size but set back, their patio being on the roof of the house below. Several layers upwards give a terraced effect. The inner part of the house accesses onto an internal 'street', similar to the walkways in a shopping precinct. A similar arrangement backs onto the first, creating a triangular section. Within the heart of the section is space for shops, cafes, surgeries, gyms because rarely do these need external windows. Even office accommodation could be included: many office staff don't have a view out the window, and even then, it's not dramatic. With the technology now available, large display screens could give the impression of windows, with any sort of much better view than another building. The structure would be of a standardised columns and beams construction so that internal walls would not be load bearing, so could be moved and removed as required, thus future-proofing the building for changing and developing needs.

Potential: if the hybrid buildings comprised a row of ten 50 sqm apartments on each of two opposing sides, eight storeys high, each block could provide 160 apartments on a footprint of 50x60m. Two blocks fit in a hectare so 320 dph. 32h available: 10,240 units of fifty sq m apartments.

That's plenty of room for trees and open space, with the shops and facilities within the building, the car park on the ground floor, so the residents need never get wet while living there.

Figure 11: Basic concept of the HiBrid Building



© Nigel Tansley

The patios of the apartments would be hung with flower tubs so the overall impression of the building would be of merging with the countryside, hence reducing the visual impact of the building.

This is not a new idea.

Below is the Alt-Erlaa estate in Vienna. Built in the 1970s it is held as an example of a community project that is an outstanding success. People are on waiting lists to live there.

This is the description in one website (1): 'Every apartment . . . opens out on to a generous balcony which terminates in a half-drum planter, wide and deep enough for small trees. A low-tech integrated watering system recycles rain into the planters, which retreat at each level according to the hyperbolic curve of the building form.'



Courtesy Stefano Boeri Architetti (2)

And below is Liuzhou Garden City in Southern China, one of a series of similar projects currently being built around the world.

From a magazine article (2):

'Instead of completely getting rid of the trees to build houses, the city's design accommodates the surrounding greenery. Homes and commercial buildings will be covered with trees, with gardens on the balconies of every floor, and rooftops that are home to miniature forests.'

Stafano Boeri, the architect: ‘I have been working on the idea of urban forestation for years,’ says Boeri. ‘In those areas of the planet where it is still necessary to build new cities, we are planning real forest cities for a maximum of 150,000 inhabitants.’

(courtesy Science Focus Magazine)



Liuzhou Garden City © Stefano Boeri Architetti

The overall design addresses the visual aspects of the development, assisting it to merge with the countryside with green spaces and green terraces where a taller building is used, and in the case of substantial sized buildings adapt a more natural contour so that instead of vertical walls there is a flowing increase in height, in anticipation of climate change and high winds, so that these flow over rather than hitting the front of larger developments and also helping the development visually to merge better with the countryside.

These innovative concepts should allay any concerns regarding the site being within the AONB. In addition, the AONB seems to include the neighbouring Kingstanding Way (also the Tesco site at Pembury which has just had its wooded area removed) and is between an industrial estate, a scrap yard, a dual carriageway and roundabout. The field itself is unproductive and unmaintained though a few areas of ancient woodland add aesthetic value to the site. The addition of wooded areas between the buildings would enhance the environment in that respect. The site would not be visible from neighbouring residences and from a distance – if designed to merge with the countryside its view would be relatively insignificant amongst the wider area and should be less noticeable than the conspicuous roofs of the industrial estate which have already compromised the long-distance view.

For these reasons the AONB status at Colebrook should be relaxed, particularly when this might be an excellent alternative to building on green belt, productive arable fields in the middle of the countryside and where the infrastructure required will require significant additional funding on top of the usual commitments by developers to local needs.

In summary **the housing potential for these (groups of) sites is over 10,000 units** (see also Fig. 12).

Figure 12: Housing Yield for Selected High Potential Sites

Sites	Dwellings (#)	Commentary
Blantyre plus site 325	3,510	At 30 dph
East Pembury group of sites:	674	At TWBC's figures for each site
Pembury Road, Sandown Park	654	At TWBC's figures for each site
A21/A264 junction, Tesco site	143	At 30dph: 600 apartments in four storey flats
Liptraps Lane	60	At TWBC's figures: 126 apartments in four storey flats
Former Gasworks, Sandhurst Road	170	At TWBC's SHELAA figures for that site. Could be 373 apartments in a mix of flats and housing at TWBC's figures
Colebrook Estate	5,000	Up to 10,000 apartments plus accommodation for businesses, retail, leisure etc. by using the Hybrid Building concept
Total	10,211	

The diagram below compares SS3 with these sites relative to nearby transport / retail infrastructure.

Figure 13: Proximity to Transport/Retail - Comparison of SS3 and High Potential Sites

Distance from centre of site (miles) to:	CA1 Capel 2,500 - 2,800 dwellings	Blantyre plus site 325 3510 dwellings at 30dph	East Pembury group of sites 674 dwellings at TWBC's figures for each site	Pembury Road, Sandown Park group of sites 654 dwellings at TWBC's figures for each site	A21/A264 junction, Tesco site 143 dwellings at 30dph or 600 apartments in four storey flats	Liptraps Lane 60 dwellings at TWBC's figures or 126 apartments in four storey flats	Former Gasworks, Sandhurst Road 170 dwellings at TWBC's SHELAA figures for that site or 373 dwellings in a mix of flats, plus housing at TWBC's figures	Colebrook Estate: 960 houses at 30dph or c5,000 apartments plus businesses, retail, leisure etc.
Nearest A road 1	2.3 miles Towards Tunbridge Wells and Maidstone	2.0 miles Towards Cranbrook	0.5 miles A21 towards London and the coast	0.3 miles A21 towards London and the coast	0.1 miles A21 towards London and the coast	1.4 miles A21 towards London and the coast	1.9 miles A21 towards London and the coast	0.3 miles A21 towards London and the coast
Nearest A road 2	3.3 A21 towards London and the coast	3.5 A229 Towards Lamberhurst	1.4 A264 Towards Tunbridge Wells and Maidstone	0.1 A264 Towards Tunbridge Wells and Maidstone	0 A264 Towards Tunbridge Wells and Maidstone	1.6 A264 Towards Tunbridge Wells and Maidstone	1.0 A264 Towards Tunbridge Wells and Maidstone	1.4 A264 Towards Tunbridge Wells and Maidstone
Railway station 1	3.7 Tonbridge (cross border)	4.7 Staplehurst	4.2 Tunbridge Wells	2.1 Tunbridge Wells	2.5 Tunbridge Wells	0.4 High Brooms	0.2 High Brooms	1.3 High Brooms
Railway station 2	4.3 Paddock Wood	4.1 Marden	4.2 High Brooms	2.1 High Brooms	2.5 High Brooms	2.2 Tunbridge Wells	1.7 Tunbridge Wells	3.2 Tunbridge Wells
Railway station 3	6.6 High Brooms	8.6 Paddock Wood	5.1 Paddock Wood	5.8 Paddock Wood	5.5 Paddock Wood	4.8 Tonbridge (cross border)	4.0 Tonbridge (cross border)	3.8 Tonbridge (cross border)
Railway station 4	7.6 Tunbridge Wells	19.8 Ashford (cross border)	5.8 Tonbridge (cross border)	4.8 Tonbridge (cross border)	4.8 Tonbridge (cross border)	7.7 Paddock Wood	7.7 Paddock Wood	6.6 Paddock Wood
Nearest supermarket	3.4 Tesco Pembury (cross border)	3.9 Spar, Staplehurst (cross border)	1.5 Tesco Pembury	0.5 Tesco Pembury	0 Tesco Pembury	0.7 Asda Tunbridge Wells	1.2 Asda Tunbridge Wells	0.3 Asda Tunbridge Wells
Nearest supermarket	4.3 Waitrose, Paddock Wood	4.4 Co-op, Cranbrook	3.2 Asda Tunbridge Wells	1.8 Asda Tunbridge Wells	1.9 Asda Tunbridge Wells	2.5 Tesco Pembury	2.4 Tesco Pembury	1.8 Tesco Pembury
Nearest supermarket	5.8 Asda, Tunbridge Wells	8.5 Waitrose, Paddock Wood	4.9 Sainsburys Tunbridge Wells	2.7 Sainsburys Tunbridge Wells	3.1 Sainsburys Tunbridge Wells	2.9 Sainsburys Tunbridge Wells	2.3 Sainsburys Tunbridge Wells	1.4 Sainsburys Tunbridge Wells
Nearest supermarket	12.3 Asda at Kings Hill would create cross border issues with TWBC	12.3 Asda, Tunbridge Wells	5.1 Waitrose, Paddock Wood	4.8 Sainsburys Tonbridge (cross border)	4.9 Sainsburys Tonbridge (cross border)	4.8 Sainsburys Tonbridge (cross border)	4.5 Sainsburys Tonbridge (cross border)	3.8 Sainsburys Tonbridge (cross border)

Together, and in some cases individually, these high potential sites provide a realistic alternative to building at Capel.

E. Conclusion & Next Steps

In reviewing the Plan and the parts of the borough we have been able to research to date, we have come to the conclusion that there are better alternatives to building at Capel:

If a Garden Village has to be the chosen option, we advocate building this in a location where it would be less intrusive on neighbouring boroughs. Blantyre Park is a possibility, although it would affect nearby Staplehurst regarding through traffic and commuters using the station.

Otherwise:

- Explore and fully exploit brownfield sites throughout the borough;
- Distribute the housing allocation along the A21 corridor at, for example, the eastern end of Pembury, the Pembury Road / Sandown Park area, Castle Hill and Colebrook Park;
- Maximise potential near to High Brooms station with sites such as the gas works site and playing field;
- Ensure that current under-utilised land is developed, such as car parks, building above these to retain the car park itself, for example on the Longfield Road Industrial Estate and the area around the Sainsburys / Homebase area;
- Maximise future land usage by eliminating surface car parks, and ensuring that where car parks are built the airspace above is developed too;
- Increase density of new-build housing to maximise land efficiency;
- Review the design of larger developments to incorporate new concepts to improve living conditions so that residents do not have to experience weather conditions just to go shopping or to their car (i.e. simply a development of shopping malls extended to residential situations);

We propose to continue searching for suitable sites and considering other solutions, but it is felt that rather than being re-active, TWBC should be even more pro-active in its search for these.

We sincerely hope that TWBC will review their concept of building on green belt, productive arable land in the open countryside with unique historical and cultural considerations and little in the way of infrastructure and re-consider locating developments of varying sizes throughout the borough using existing infrastructure and making best use of under-utilised land.

With this challenge comes the opportunity for TWBC to propose innovate solutions which might become the blueprint for other boroughs to follow, evolving to the next generation the principles of the current century old garden city principles.

Appendix

Appendix A. Rejected Sites – Rationale for Reconsideration for each Site

Sites	TWBC reason for rejection:	Response relating to the site	Response relating to CA1
CAPEL			
11	There are landscape concerns associated with this site. The rear part of the site is an encroachment into the countryside beyond which would be logical	Not sure what the concerns are except that the outer boundary of the site would be little further than the nearby housing and their gardens.	CA1 would destroy rather than encroach the countryside that the encroachment limitations on the village sites are designed to avoid.
48	There are landscape concerns associated with this site. The rear part of the site is an encroachment into the countryside beyond which would be logical	This site adjoins late site 10 and the same reasoning applies as for that. The view of the landscape would not change much, this site being surrounded by existing development. To minimise intrusion, buildings would best be north of a line between the outer limits of nearby houses. Together the two sites would enable a total space available of 1.37ha and a potential for 41 houses according to TWBCs figures.	CA1 would have far greater effects on the landscape than infilling situations
141	The site is currently remote from a settlement centre. Any yield likely from this site is likely to be of a scale not considered suitable for allocation. It could be considered as part of a reasonable alternative for an urban expansion of Paddock	The site is only 0.7 mile from Five Oak Green centre and 1.7 miles (1.4 on foot) from Paddock Wood centre and the mainline railway station with destinations to London and the coast. There is no pavement but nevertheless pedestrians, including schoolchildren, frequently use the road to walk between Five Oak Green and Paddock Wood.	CA1 would be equally remote from a settlement centre. Even a development as large as proposed would not provide the amenities found in nearby towns so the traffic impacts would be substantial.
143	There are landscape concerns associated with this site. The site is an encroachment into the countryside beyond which would be	The view of the landscape would not change much, this site being surrounded by existing development.	CA1 would have far greater effects on the landscape than infilling situations
156	The site is remote from a settlement centre and is unlikely to be sustainable in this context.	The remoteness from a settlement centre would be regarded as a positive by many people. However, it is on a main road serving Tunbridge Wells (5.9 miles) and Maidstone and close to Five Oak Green (1.6 miles) and Paddock Wood (2.9 miles) with its mainline railway station.	CA1 would also be remote from a neighbouring settlement: from its centre Five Oak would be 2.5 miles, Paddock Wood Station 4.2 miles, Tunbridge Station (out of TW borough boundary so cross-boundary issues) 3.6 miles. Tunbridge Wells centre would be 7.4 miles. So CA1 would actually be more
216	There is a heritage and landscape concern, the site being in proximity to historic farmsteads and forming part of the landscape setting of the settlement. There is also concern about the ability to provide an appropriate means of access to the	Local opinions vary regarding this site because it is located on productive agricultural land and would intrude upon that. However the view from the wider part of the countryside would be change only minimally, being already one of a built up area because the site backs onto an existing row of houses. There appears to be an access, along a single track carriageway currently serving the neighbouring farm who presumably own this site.	Local concerns are far greater about the heritage and landscape concerns relating to CA1.
307	There is a landscape concern that this site would erode the green gap between Five Oak Green and Paddock Wood. This is a significant chunk of a Green Belt parcel the release of which would cause	The green gap between Five Oak Green and Paddock Wood is a significant reason not to develop this site. However, being enclosed by the nearby railway to the north, the residential home to the east, and the church, allotments and community centre with its playing field to the west, this seems a logical area to infill if developed sensitively, retaining an open or preferably wooded area at the front, southernmost part of the site where it fronts onto the road.	It is positive that TWBC have chosen not to include this site for the reasons given, but inconsistent that they should then approve of the much larger fields (site 142) adjoining Badsell Road between the A228 and Paddock Wood.
329	There are heritage and landscape concerns with this site. It lies adjacent to historic farmsteads and forms part of the landscape setting of the settlement.	The issues raised are valid ones but could be addressed with sensitive development of the site. In order to maintain the visual break between the village and the school, the development should be located at the rearward, northern, end of the site and the open area maintained at the front or a screen of trees planted to reduce the carbon imprint of the development. The railway at the northern end of the site would be a noise and slight pollution factor but not an unacceptable one. Due to the existing height of the railway embankment and the tree cover upon it the development would be capable of accepting units of up to four storeys high with parking beneath to maximise efficient use of space.	The issues raised are similar to those of CA1 but with that site the impact would be significantly and unacceptably greater.
330	This is a developed site including farm buildings adjacent to LBD and is likely to be sustainable in this context. Any likely yield on this site however is likely to be of a small scale that is not considered suitable for allocation	The site in parts is certainly unsuitable, with heritage hoppers huts which should be protected. However, the eastern end of the site, east of the access to Finches Farmhouse, could be developed in the same way that the houses on the western, southern part of Nortons Way were deemed to be acceptable infill of greenfield land in the mid 1980s despite that fact the at that time it was thought that green belt land was sacrosanct.	The yield would certainly not approach the thousands of houses proposed for the CA1 site but small sites such as this should be used across the borough in preference firstly to avoid destroying valuable agricultural land and also to reflect more local needs of the borough.
331	There are heritage and landscape concerns with this site. It lies adjacent to historic farmsteads and forms part of the landscape setting of the settlement.	The issues raised are valid ones but could be addressed with sensitive development of the site. In order to maintain the visual break between the village and the school, the development should be located at the rearward, northern, end of the site and the open area maintained at the front or a screen of trees planted to reduce the carbon imprint of the development. The railway at the northern end of the site would be a noise and slight pollution factor but not an unacceptable one. The site would not be immediately adjacent to the railway, with a 50m wide field between it and the railway.	
418	There is some PDL on the site. Due to uncertainty about land availability over the Plan period, it is considered unsuitable for allocation	The solar farm part of the site is separate to the boundary of the site shown. As there are existing agricultural / industrial buildings on site the visual amenities would not be compromised by a development of residential buildings. Although the farm buildings appear to serve the surrounding fields, the use of these for a solar farm reduces that need.	As this is previously developed land this would be a far better use of land than destroying agricultural land as in the CA1 proposal.
453	This site is remote from the settlement centre and unlikely to be sustainable in this context. It could be considered in the context of the Tudeley new settlement reasonable	The site is in the centre of the settlement of Tudeley. Tudeley is a small hamlet of a few scattered houses. It is nearer to Tonbridge (though with cross border issues) at 2.5 miles than is the centre of the proposed CA1 site (currently 3.6 miles) and Five Oak Green which is 2.2 miles in the other direction.	The site is less remote than CA1 which would be the other side of the railway across a narrow bridge, or would need significant infrastructure being built.
Late site 10	There are landscape concerns associated with this site. The rear part of the site is an encroachment into the countryside beyond which would be logical	This site adjoins site 48 and the same reasoning applies as for that. The view of the landscape would not change much, this site being surrounded by existing development. To minimise intrusion, buildings would best be north of a line between the outer limits of nearby houses. Together the two sites would enable a total space available of 1.37ha and a potential for 41 houses according to TWBCs figures.	CA1 would have far greater effects on the landscape than infilling situations

Sites	TWBC reason for rejection:	Response relating to the site	Response relating to CA1
PEMBURY			
28	Site is not well related to the settlement centre and is likely to be unsustainable in this context. There are also concerns about access and highway matters	This site is located 0.8 miled (quarter of an hours walk, shorter than from Tunbridge Wells Station to Skinners School.) This site could potentially work as a group of site numbers 190, 191, 208, 290, 28, 64, 332 and 379. Because these sites all adjoin, the challenges of the narrow local lanes could be overcome with a communication road leading through these sites with access for cars via site 190 onto Hastings Road at a point very near to the junction with the A21 and hence away from Pembury village. There are bus stops serving destinations in many directions 100m from this access to site 190.	As a field used not for agricultural purposes but for leisure applications - horse-grazing - it could be argued that to build on the productive fields in CA1 would be far more damaging than building here.
64	Site is not well related to the settlement centre and is likely to be unsustainable in this context. There are also concerns about access and highway matters	The existing house would need to remain and it's immediate surroundings treated sympathetically because of its listed status (maybe other listed buildings too) In combination with neighbouring sites 28, 290, 208, 191, 190 this site would be accessible: By car easily to A21, Pembury centre (1 mile, 3mins) and Tunbridge Wells; By foot easily to buses serving eight destinations (0.3 miles, 6 mins) By bike easily to Pembury, Tunbridge Wells, Tonbridge and National Cycle Route 18 Therefore it would be far more accessible to local towns than the proposed site at Capel which currently has minimal existing infrastructure. Would adjoin the boundaries of only 4 properties and be near one property on the other side of the road. Existing wooded boundaries would screen the new development from the neighbouring houses. There are no neighbouring houses except for two properties separated from the site by highways and hedges. Although the site is greenfield and some parts being ALC Grade 3 (not regarded as valuable in development terms) it is not currently used for productive agricultural purposes and would probably be too small to be usable on an industrial scale. Being a wild site the location would have ecological value, but would be less sensitive to development than the larger areas proposed in Capel. The existing woodland and the small meadow by the stream at the lower part of the site should be protected, by building only on the underutilised meadow areas. Being surrounded on three sides by neighbouring houses, this is a logical infill situation and would cause less harm than sites in the Capel parish. Although reference is made to EA flood zones 2, 3a and 3b there is no indication of flooding issues here or in the whole of Pembury on this government website: https://flood-map-for-planning.service.gov.uk/confirm-location?eastng=-563457&northing=-140865&placeOrPostcode=TN26204BG . So if there is a localised risk of flooding this could easily be mitigated. This is unlikely due to the sloping nature of the site. The Capel proposed development however indicates parts in zones 2 and 3.	Although the site is in the Green Belt and AONB, its semi-urban situation makes it's change of use to residential less harming than the use of larger areas of Green Belt, equally attractive woods and productive agriculture in the more rural Capel parish. There are no apparent signs of the landscape being historic, and it's current lack of use does not reflect this history, compared to the Capel area which has visible and current indications of its historic characteristics in it's clearly seen heritage with farmhouses and oast houses visible from most parts of the parish and its still current use for agricultural purposes.
190	In conjunction with other site submissions at the eastern side of Pembury, there are significant highway impact concerns including on the nearby A21 major distributor road managed by Highways England	Neighbouring sites 375, 191. Connections by car immediately to A21 (southbound 100m, northbound 0.8 mile, 1 min, at Kippings Cross roundabout), Pembury centre (0.7 mile, 2mins) and Tunbridge Wells (13mins, 3.7miles); By foot to Pembury centre (14 minutes) By bus - just outside on street to buses serving eight destinations (60metres, 1 min) By bike easily to Pembury centre (3 minutes), Tunbridge Wells (20 minutes, 3.7miles on the National Cycle Route 18 which passes 60metres away from the entrance to the site, and Tonbridge via the new dedicated cycle routes past the hospital and along the A21. Would adjoin the boundaries of less than ten properties with no properties on the other side of the road. Existing wooded boundaries would screen the new development from the neighbouring roads and reduce the noise levels from them. The noise levels would be no greater than in neighbouring Tonbridge, Molecroft Way, where the houses are adjacent to the A21 and where people do choose to live. Although the site is greenfield and some parts being ALC Grade 3 (not considered significant for planning purposes) it is not currently used for productive agricultural purposes and would probably be too small to be usable on an industrial scale. Noted that there is a local plan designation on part of the site and this could be incorporated in the site or the agreement transferred to the neighbouring field to the east of the site which is also currently not used for agricultural purposes. Although the site is in the Green Belt and AONB, its semi-urban situation adjoining a main road makes it's change of use to residential less harming than the use of larger areas of Green Belt, more attractive woods and productive agriculture in the more rural Capel parish. In combination with neighbouring sites 290, 208, 191, 190 this site would give them access to the A21. Being surrounded on one side by neighbouring houses, on another side by a playing field, and on the other two sides by a local road and the A21 this reduces the value of the AONB status so is a logical infill situation and would cause less harm than sites in the Capel parish.	There are no apparent signs of the landscape being historic, and it's use does not reflect this history, compared to the Capel area which has visible and current indications of its historic characteristics in it's clearly seen heritage with farmhouses and oast houses visible from most parts of the parish and its still current use for agricultural purposes on fields with an acknowledged medieval heritage.
191	In conjunction with other site submissions at the eastern side of Pembury, there are significant highway impact concerns including on the nearby A21 major distributor road managed by Highways England.	Neighbouring sites 290, 208, 190. 12 houses, or 96 depending on adjoining site. In conjunction with neighbouring site 190 this site would be accessible: By car easily to A21, Pembury centre (1 mile, 3mins) and Tunbridge Wells; By foot easily to buses serving eight destinations (0.3 miles, 6 mins); By bike easily to Pembury, Tunbridge Wells, Tonbridge and National Cycle Route 18 Would adjoin the boundaries of 19 properties and a playing field. There would be no properties on the other side of the road. Existing hedge boundaries would partially screen the new development from the neighbouring houses. 'High noise levels' are mentioned in sustainability assessment, assumed to be from the A21 nearby which is over 200m away at the nearest point of the plot, with neighbouring houses being nearer. Although the site is greenfield and some parts being ALC Grade 3 (grade 2 mentioned in the Issues to Consider but not in the Sustainability data field) it is not currently used for productive agricultural purposes and would probably be too small to be usable on an industrial scale. Although the site is in the Green Belt and AONB, its semi-urban situation makes it's change of use to residential less harming than the use of larger areas of Green Belt, equally attractive woods and productive agriculture in the more rural Capel parish. There are no apparent signs of the landscape being historic, and it's use does not reflect this history, compared to the Capel area which has visible and current indications of its historic characteristics in it's clearly seen heritage with farmhouses and oast houses visible from most parts of the parish and its still current use for agricultural purposes on fields with an acknowledged medieval heritage. Noted that there is a local plan designation on part of the site and this could be incorporated in the site or the agreement transferred to the neighbouring field to the east of the site which is also currently not used for agricultural purposes.	The site would be ecologically less sensitive to development than the areas proposed in Capel, due for example to the nature of the field use, the existing neighbouring houses and the A21.
208	Site is not well related to the settlement centre and is likely to be unsustainable in this context. In addition, in conjunction with other site submissions at the eastern side of Pembury, there are significant highway impact concerns including on the nearby A21 major distributor road managed by Highways England	Neighbouring sites 28, 290, 191, 282. In combination with neighbouring sites 191, 190 this site would be accessible to: By car easily to A21, Pembury centre (1 mile, 3mins) and Tunbridge Wells; By foot easily to buses serving eight destinations (0.3 miles, 6 mins); By bike easily to Pembury, Tunbridge Wells, Tonbridge and National Cycle Route 18. Would adjoin the boundaries of only 1 property, which is also on the Call for Sites list. Existing hedged boundaries would screen the new development from the neighbouring houses. The site is greenfield with some parts being ALC Grade 2 and is currently used for productive agricultural purposes. For this reason, despite the playing field adjacent to the site, it would only be appropriate to use part of the site for development, the south western of the two fields in this parcel, the other field to remain available for agriculture. There are no apparent signs of the landscape being historic, and it's use does not reflect this history, compared to the Capel area which has visible and current indications of its historic characteristics in it's clearly seen heritage with farmhouses and oast houses visible from most parts of the parish and its still current use for agricultural purposes on fields with an acknowledged medieval heritage. The site would be ecologically less sensitive to development than the areas proposed in Capel, due for example to the existing neighbouring houses.	Being surrounded on three sides by nearby neighbouring houses, and on the fourth by a playing field, this is a logical infill situation and would cause less harm than sites in the Capel parish.
290	Site is not well related to the settlement centre and is likely to be unsustainable in this context. There are also concerns about access and highway matters	In combination with 191 and 190 would be accessible to A21. Woodside Road is a narrow country lane so not good for access. Logical infilling, esp as already developed. If used in conjunction with 208, 191, 190 leave house and garden as is and use as screen between existing houses and new development but use end of garden for access between road and site 208 and beyond	The agricultural land rating of this site is not relative due to it being a domestic garden. It would not be logical or good policy to choose productive agricultural land over this site.

Sites	TWBC reason for rejection:	Response relating to the site	Response relating to CA1
332	The site straddles the boundaries of two Green Belt parcels the impact of which would have high harm and very high harm if released from the Green Belt. There is also a more general landscape concern due to the topography of the site. In addition allocation of this site would not be a logical infilling or rounding off, and would be a less logical extension to the LBD.	<p>Adjacent to site 64 and 679, on the opposite side of Romford Road. In combination with neighbouring sites 64, 28, 290, 191, 190 this site would be accessible to the A21: By car easily to A21, Pembury centre (1.5 miles, 5mins) and Tunbridge Wells; By foot to buses serving eight destinations (0.6 miles, 13 mins); By bike easily to Pembury, Tunbridge Wells, Tonbridge via National Cycle Route 18. Would adjoin the boundaries of only 2 properties and be opposite 11 properties on the other side of Romford Road.</p> <p>Although 'Site Description' mentions 'some pavement along Romford Road but this is sited further west, in fact there is pavement on the opposite side of Romford Road for two thirds of the site frontage. Existing wooded boundaries would screen the new development from the neighbouring houses. Although the site is greenfield and some parts being ALC Grade 3 it is not currently used for productive agricultural purposes and would probably be too small to be usable on an industrial scale. Although the site is in the Green Belt and AONB, its semi-urban situation makes it's change of use to residential less harming than the use of larger areas of Green Belt, equally attractive woods and productive agriculture in the more rural Capel parish.</p> <p>There are no apparent signs of the landscape being historic, and it's use does not reflect this history, compared to the Capel area which has visible and current indications of its historic characteristics in it's clearly seen heritage with farmhouses and oast houses visible from most parts of the parish and its still current use for agricultural purposes on fields with an acknowledged medieval heritage. The site would be ecologically less sensitive to development than the areas proposed in Capel, due for example to the existing neighbouring houses. The wooded areas especially those on the western end of the site should be preserved for ecology purposes and to provide screening for neighbouring houses. Reference is made to 'housing in this location would not suit older people due to distance from services' but that would make a lot of housing in Pembury and elsewhere unsuitable and needs to be added in all data fields for Sustainability Assessment, unless within a very short distance of amenities. With the introduction of electric buggies the independence of old people has increased. Summary: Being surrounded on three sides by nearby neighbouring houses, this is a logical infill situation and would cause less harm than sites in the Capel parish.</p>	<p>Although reference is made to EA flood zones 2, 3a and 3b there is no indication of flooding issues here or in the whole of Pembury on this government website: https://flood-map-for-planning.service.gov.uk/confirm-location?easting=563457&northing=140865&placeOrPostcode=TN2%204BG. So if there is a localised risk of flooding this could easily be mitigated. This is unlikely due to the sloping nature of the site. The Capel proposed development however indicates parts in zones 2 and 3. Being surrounded on three sides by neighbouring houses, this is a logical infill situation and would cause less harm than sites in the Capel parish.</p>
354	The site includes some PDL and other built development, which it is possible may be converted. Constraints relating to the site including highway matters mean that any likely yield is likely to be of a scale that is not considered suitable for allocation	<p>Green field but seems to be not farmed. Derelict barn in south west corner (just off site). Adjacent to existing houses and fairly logical infill area. Very narrow lane access but it would be possible for that to be widened for access because a lot of the proposed plot runs parallel to the Stone Court Lane access. Adjoins the boundaries of 9 properties and be opposite 14 properties on the other side of Stone Court Lane. Although 'Site Description' mentions 'lack of pavement along Stone Court Lane', with the format of the proposed site there is potential room for widening Stone Court Lane at that point and adding a pavement to the point of access onto the site. Existing wooded boundaries would screen the new development from most of the neighbouring houses. Although the site is greenfield and some parts being ALC Grade 3 it is not currently used for productive agricultural purposes and would probably be too small to be usable on an industrial scale. Although the site is in the Green Belt and AONB, its semi-urban situation makes it's change of use to residential less harming than the use of larger areas of Green Belt, equally attractive woods and productive agriculture in the more rural Capel parish. It's proximity to the neighbouring fields would require sensitive development, such as single storey homes, perhaps chalet style.</p> <p>There are no apparent signs of the landscape being historic, and it's use does not reflect this history, except for non-historic redundant farm buildings, compared to the Capel area which has visible and current indications of its historic characteristics in it's clearly seen heritage with farmhouses and oast houses visible from most parts of the parish and its still current use for agricultural purposes on fields with an acknowledged medieval heritage. The site would be ecologically less sensitive to development than the areas proposed in Capel, due for example to the existing neighbouring houses. In being adjacent to neighbouring houses and commercial operations, this is a logical infill situation if used with sensitivity to its edge of the settlement and would cause less harm than sites in the Capel parish which would be wholly in virtually unoccupied countryside. Although reference is made to EA flood zone 2, there is no indication of flooding issues here or in the whole of Pembury on this government website: https://flood-map-for-planning.service.gov.uk/confirm-location?easting=563457&northing=140865&placeOrPostcode=TN2%204BG. So if there is a localised risk of flooding this could easily be mitigated. The Capel proposed development however indicates parts in zones 2 and 3 and experience indicates this is likely to occur again. Reference is made to 'Stone Court Farm Lane will not be user friendly for those with mobility problems' but that would make a lot of housing in Pembury and elsewhere unsuitable and needs to be added in all data fields for Sustainability Assessment, unless within a very short distance of amenities. With the introduction of electric buggies the independence of old people has increased.</p>	<p>Being partly PDL land partly within the LBD and with neighbouring houses along one side, this is a logical infill situation and would cause less harm than sites in the Capel parish.</p>
367	Site is not well related to the settlement centre and is likely to be unsustainable in this context. There is landscape concern and the site forms a significant chunk of a Green Belt parcel the release of which would cause high harm if released. There are access and highway concerns	<p>Neighbouring Site 64 and 379, adjacent to site 191. The existing house would need to remain and it's immediate surroundings treated sympathetically because of its listed status (maybe other listed buildings too). The remainder of the plot is natural woodland and would be an asset to enhance the neighbouring sites 379 and if necessary aid access to the developments on that site. In conjunction with neighbouring sites 64, 28, 290, 206, 191, 190 this site would be accessible: By car easily to A21, Pembury centre (1 mile, 5mins) and Tunbridge Wells; By foot easily to buses serving eight destinations (0.3 miles, 6 mins) By bike easily to Pembury, Tunbridge Wells, Tonbridge and National Cycle Route 18. Therefore it would be far more accessible to local towns than the proposed site at Capel which currently has minimal existing infrastructure. Would be near six properties on the other side of Woodside Road. Existing wooded boundaries would screen the new development from the neighbouring houses. Although the site is greenfield and ALC Grade 2 and 3 (the latter not regarded as valuable in development terms) it is not currently used for productive agricultural purposes and would probably be too small to be usable on an industrial scale. There are no apparent signs of the landscape being historic, and it's current lack of use does not reflect this history, compared to the Capel area which has visible and current indications of its historic characteristics in it's clearly seen heritage with farmhouses and oast houses visible from most parts of the parish and its still current use for agricultural purposes. Being a wild site the location would have ecological value, but would be less sensitive to development than the larger areas proposed in Capel. The existing woodland and the small meadow by the stream at the lower part of the site should be protected, by building only on the underutilised meadow areas. Being surrounded on three sides by neighbouring houses, this is a logical infill situation and would cause less harm than sites in the Capel parish. Although reference is made to EA flood zones 2, 3a and 3b there is no indication of flooding issues here or in the whole of Pembury on this government website: https://flood-map-for-planning.service.gov.uk/confirm-location?easting=563457&northing=140865&placeOrPostcode=TN2%204BG. So if there is a localised risk of flooding this could easily be mitigated. This is unlikely due to the sloping nature of the site. The Capel proposed development however indicates parts in zones 2 and 3.</p>	<p>Although the site is in the Green Belt and AONB, its semi-urban situation makes it's change of use to residential less harming than the use of larger areas of Green Belt, equally attractive woods and productive agriculture in the more rural Capel parish.</p>
379	Site is not well related to the settlement centre and is likely to be unsustainable in this context. There is landscape concern and the site forms a significant chunk of a Green Belt parcel the release of which would cause high harm if released. There are access and highway concerns	<p>Access to Romford Road at north is not mentioned. There is access to the field just at the end of the paved part of Romford Road. For access to Henwood Green Road, reference is made to depot as if access could be gained to that, although that is not included in the map. Depot is Sturgeons, civil engineers - road construction. That site (458) has been approved for development.</p>	<p>Although there is a value in unmanaged land, between this site and woodland in a countryside setting and productive agricultural lands this would make the logical choice for development, using sensitivity to the prevailing conditions on the site.</p>

Sites	TWBC reason for rejection:	Response relating to the site	Response relating to CA1
TUNBRIDGE WELLS			
91	This is a PDL site within the LBD and is considered a sustainable site in this context. Any likely yield on this site is likely to be of a scale that is not considered suitable for allocation.	Noted that this site is considered sustainable one. Although a small site it would be possible to build three-storey flats with parking on the ground floor in this location	The yield on this plus other small sites would be likely to contribute a significant number of dwellings to negate the value of building on green fields in the middle of the countryside.
99	There are significant concerns about impact on the landscape and settlement pattern as well as concerns that this would result in coalescence of settlements (Royal Tunbridge Wells and Pembury). The site is part of a Green Belt parcel the release of which would cause high harm. There are also highway concerns.	This site in combination with sites 114 and 411 could provide a significant amount of housing. Issues of coalescence could be resolved with sensitive planning of the site, with the area fronting Pembury road retained as an open space and trees used not only as screening but to slightly offset the negative carbon effect of any sort of building development. The visual issues of a development on this site would also be mitigated by the downward slope of the site, away from Pembury Road. Site 411 has been described as "landlocked" without its own access, but this could be via this site 99 and beyond to site 114. Access could be onto the main A264 Pembury Road and hence the A21 giving this location excellent travel potential to the north, west and east without affecting Tunbridge Wells. Because of the heavy traffic conditions in the Pembury Road traffic for the development would need to be carefully managed: exiting traffic for Tunbridge Wells would need to turn left towards Pembury and travel 300m to the roundabout to perform a U turn there and take the Tunbridge Wells exit. Traffic entering from the A21/Pembury direction would need a central area large enough to keep vehicles waiting to turn right out of the way of westbound through traffic. The most likely best position for this junction would be opposite the entrance to Oakley School where the road widens. At this location, the alternative of a mini roundabout arrangement could be considered, which would ease the exit of traffic from the school in an eastbound direction, thus enhancing the safety factor for pupils. Altogether the three sites total nearly 23 ha giving a TWBC yield of 654 houses at 30dph. At 50dph that raises to 1091 dwellings.	"The site is part of a Green Belt parcel the release of which would cause high harm": the same applies to CA2 in Tudeley.
100 in conjunction with sites 30, 199 and 205	There are landscape impact concerns as well as significant highway concerns	Noted that this site was to be in conjunction with other larger sites covering a significant rural area. Together with those sites it is correct to reject the whole group, but this site by itself would be logical land fill being next to a busy road serving the built up area on the opposite side of the road and because of its proximity at the eastern end to recently built dwellings. It is not clear whether the significant highway concerns relate to the whole group of sites, as the yield information does, or whether to this individual site. Other parts of the larger area would access only narrow country lanes, whereas this sites access to Speldhurst Road is onto a wider road serving the streets to the north of the site and leading (340m away) to the main A26 road to Tunbridge Wells at a junction controlled by traffic lights. The site description specifies the field is in agricultural use but this does not appear to be the case.	Although a greenfield site, this is better option than fields in productive use in Capel. It is not in or near the AONB (nearest point 0.6km away) mentioned in the details. AONB is mentioned but must relate to the group this site was included within.
104	This site is a PDL site in the LBD and is a sustainable site in this context. Any likely yield on this site is likely to be of a scale that is not considered suitable for allocation.	Description indicates AONB: being in the centre of Tunbridge Wells the AONB is remote from this site. The description does not include plans for the development: if the potential number of dwellings depends on the current offices simply being converted, this number can be enhanced by (a) building above the car park at the rear of the property and (b) doing this in conjunction with adjoining site 105	To convert offices would be the most environmentally option between that and building on greenfield, green belt land
105	This site is a PDL site in the LBD and is a sustainable site in this context. Any likely yield on this site is likely to be of a scale that is not considered suitable for allocation	Description indicates AONB: being in the centre of Tunbridge Wells the AONB is remote from this site. The description does not include plans for the development: if the potential number of dwellings depends on the current offices simply being converted, this number can be enhanced by (a) building above the car park at the rear of the property and (b) doing this in conjunction with adjoining site 104	To convert offices would be the most environmentally option between that and building on greenfield, green belt land
114	There are significant concerns about impact on the landscape and settlement pattern. The site is part of a Green Belt parcel the release of which would cause high harm. There are also highway concerns.	Any highway concerns would be minimised by the proposed use for a residential home for the elderly who would generate far less traffic than a conventional development. Although a greenfield site, access is via Sandown Park, a good road also used by a school. The nearby Pembury Hospital is a positive score. This site would be excellent for the use proposed. If the site was developed in combination with sites 99 and 411 access could be gained via those sites directly to the A21 which would relieve pressure on traffic turning into and out of the Blackhurst Lane junction.	The impact on the landscape here would be significantly less than those at CA1.
134 (overlap with site 175)	This site is part PDL sited within the LBD and is sustainable in this context. It is a constrained site meaning that the likely yield on the site would be of such a scale considered unsuitable for allocation	Despite this being a constrained site, together with site 175 there would be potential for a successful build of several dwellings.	A PDL site within the LBD limit would be a far better alternative to productive green belt agricultural land at CA1
145 SALP AL/RTW13 Existing allocation AL/RTW13 in Site Allocations Local Plan	There is concern regarding the deliverability of this site during the Plan period. In addition the employment use of the site is protected by strategic protection of employment policy in the Local Plan	Together with the adjoining car parks (not included in the application) this site would have significant potential not only for residential in a prime position but for commercial applications, which should satisfy the obligations of the employment policy mentioned.	This site would provide an excellent opportunity to provide housing and employment in a prime location far better than a site such as CA1.
165	Whilst the site is in proximity to the main urban area and sustainable in that context, it is not considered this site would form a logical extension to the LBD. Furthermore, allocation of the site for development would harm the setting of Tunbridge Wells and the Green Belt and townscape. There is also uncertainty about delivery of the site as it is	If this was a new development in a virgin part of Tunbridge Wells Common this would not be acceptable. However, the site comprises a long-established car park which	
175 (overlaps with site 134)	This site is part PDL sited within the LBD and is sustainable in this context. It is a constrained site meaning that the likely yield on the site would be of such a scale considered unsuitable for allocation	Despite this being a constrained site, together with site 134 there would be potential for a successful build of several dwellings.	A PDL site within the LBD limit would be a far better alternative to productive green belt agricultural land at CA1
206	Any likely yield on this site is likely to be of a scale that is not considered suitable for allocation. The site currently has planning consent.	The planning consent is for 8 houses of up to 6 bedrooms in capacity. Instead of these, smaller houses or indeed flats could be built thus perhaps satisfying the requirement of scale that would satisfy the allocation level.	Compared to CA1 this would be a good site, being close to local amenities including schools, leisure activities and bus routes. The mainline train station is barely over a mile away.

226	There is a landscape concern about the allocation of this site	It is assumed that the landscape concern is the loss of a leisure facility. There may be a concern regarding access because, according to the description, this would be via adjoining playing fields. However it would be physically possible to access the site from the end of the adjoining road Dukes Drive where the end of the cul de sac is open to that adjoining boundary. That newly built estate (within the last year) sets a precedent for this position, extending beyond the natural line of housing at that point. It is logical that with that site being approved, this site 226 should also be acceptable. The site size is 1.07 ha and the number of houses anticipated at 32. However, more recent standards indicate a density of 50dph which would make an improved contribution to the housing needs of the borough.	It is understandable that there is a landscape concern about this site, because people can see it and they enjoy using it for leisure purposes a few times per week. The concern about the fields being lost in CA1 is likely to be less because there are fewer people to see it, which is the whole point of why land at CA1 should not be spoilt: it is quietly busy producing food for the people that currently use site 226 for their leisure: in fact it probably produces the berries for the blackcurrant drink they enjoy at half time. Not being seen by the general public and therefore not enjoying the same level of concern in that respect is not a good reason to build on it.
248 (SALP AL/RTW8) Existing site allocation AL/RTW8 in Site Allocations Local Plan	The site is a PDL site within the LBD of Royal Tunbridge Wells and is likely to be sustainable in this context. Site constraints mean that any likely yield on this site is likely to be of a scale that is not considered suitable for allocation	It is also noted "Land contamination (Railway Lane – tracks mainly and Works High Risk)" so it would be interesting to know what these issues related to. There is an railway close to the site: do these issues affect other dwellings along the track? The area of the site is specified as 1.0 ha and the developable size also 1ha which implies the existing wooded areas would be destroyed. The clear area is the centre is of about 0.24ha. Because the site is at a lower level than the neighbouring road which has few neighbours overlooking the site, because it is screened by trees and because there is a railway along one boundary thus meaning that the development would not be easily visible, it would be possible to build flats to perhaps five storeys including parking on the ground floor. With 50m sq flats plus space for services this would be likely to produce 136 apartments.	Being a site owned by Tunbridge Wells Leisure Services (according to the sign at the front gate) ownership would not be an issue. The loss of leisure facilities would be a negative but the ability to provide accommodation for 136 individuals / couples / small families would be a positive and when balanced against the potential loss of land at CA1 (over 4ha at standard 30dph levels) this is a sustainable alternative.
258	Site is a PDL site within the LBD of the main urban area of Tunbridge Wells. The site is sustainable in this context. Any likely yield on this site is likely to be of a scale that is not considered suitable for allocation.	There is currently a single storey building on the site plus a car park. The building incorporates the TN2 social centre and Sherwood Library. The site is specified as 0.20ha with 0.06ha developable. If the whole two parts of the building plus the car park were replaced by a single building with parking beneath, the social facilities could be expanded across the whole area on a raised ground floor, the car park being beneath on a lower level reflecting the sloping nature of the site, then above the social facilities three storeys of 50sq m apartments, reflecting the recently built developments neighbouring the site. Three floors of 50sq apartments plus services over 0.15ha would provide 64 apartments. Alternatively, the first floor could provide office space, in which case there would be likely space for 500 people at desks (2sq m per desk +50% for access and services).	To develop this site in a prime position next to shops and employment would be a better choice than building on farmland remote from settlements and which even with some provision would not provide the amenities and job opportunities of a central location such as this.
280	There are significant concerns regarding impact on heritage matters if this site were to be allocated, including on the historic and landscape setting of Tunbridge Wells. The site is part of a larger broad area that if released from the Green Belt would cause very high harm	Although AONB is mentioned in the details this site is not in the AONB area surrounding Tunbridge Wells.	The green fields of which this is a part are constrained within the greater area of Tunbridge Wells. There are developments to the west, to the north and to the south of this area: to the east is woodland and the open areas of Tunbridge Wells common but that area is generally regarded as being separate from the fields of this part. The reference to "The site is part of a larger broad area that if released from the Green Belt would cause very high harm" applies to a much greater degree for the more extensive lands that the CA1 proposal deems should be built upon at Capel.
328	This site is a Designated Important Open Space and is therefore not suitable for allocation.	The importance of this open space must be for aesthetic purposes and for exercising dogs.	The Important Space designation does not seem to apply to land at CA1 which is used for growing food.
359 (this site also forms part of site 400)	It is considered that there is a significant heritage concern regarding allocation of this site. It is considered that allocation of the site would have a negative effect on the setting of the adjacent Historic Park and Garden	Together with site 400 this offers an excellent site for a residential home. It is noted that whereas an empty field (site 114) was considered for C2 and C3 use no mention of this is made here despite it being next to the Halliwell Nursing Home. The position next to the Dunorland Park would be an excellent relationship, pleasant for the residents and of minimal intrusion to the park due to the generally quiet nature of the residents. The buildings would need to be two storeys maximum and designed to blend with the landscape but would be screened behind the trees mentioned in the description. The number of dwellings given as 89 represents the TWBC general standard of 30dph, which is for a house with garden. For accommodation as a residential home this site would be likely to deliver accommodation for 300 residents which would release a significant number of dwellings to market where the residents had become permanent.	Although building in this location might provide a minimal visual effect from Dunorland Park, it would be far less an important factor than building on agricultural land.
400 and including site 359	It is considered that there is a significant heritage concern regarding allocation of this site. It is considered that allocation of the site would have a negative effect on the setting of the adjacent Historic Park and Garden	Together with site 359 (included within it) this offers an excellent location for a residential home, being next to and probably associated with the Halliwell Nursing Home and the nearby Nuffield Health Tunbridge Wells Hospital. It is noted that whereas an empty field (site 114) was considered for C2 and C3 use no mention of this is made here despite its location. The position next to Dunorland Park would be an excellent relationship, pleasant for the residents and of minimal intrusion to the park due to the generally quiet nature of the residents. The buildings would need to be two storeys maximum and designed to blend with the landscape but would be screened behind the trees mentioned in the description. The number of dwellings given as 89 represents the TWBC general standard of 30dph, which is for a house with garden. For accommodation as a residential home this site would be likely to deliver accommodation for 300 residents which would release a significant number of dwellings to market where the residents had become permanent.	Although there is value in this being an area of "overgrown shrubland/greenfield" regarding environmental issues, in balance with the destruction of a wider area of land at CA2 comprising woodland and agricultural land, this is a preferable option, especially in offering a prime position for the usage suggested.
411	There are significant concerns about impact on the landscape and settlement pattern as well as concerns that this would result in coalescence of settlements (Royal Tunbridge Wells and Pembury). The site is part of a Green Belt parcel the release of which would cause high harm. There are also highway concerns.	Coalescence between Tunbridge Wells and Pembury would be unnoticed, with this site being remote from the Pembury Road. In addition, the main A21 dual carriageway together with its embankments and foliage serve as a very effective barrier between the two settlements. This site in combination with sites 99 and 114 could provide a significant amount of housing. Site 411 has been described as "landlocked" without its own access, but this could be via site 99 onto the main A264 Pembury Road and hence the A21 giving this location excellent travel potential to the north, west and east without affecting Tunbridge Wells. Altogether the three sites total nearly 23 ha giving a TWBC yield of 654 houses at 30dph. At 50dph that raises to 1091 dwellings.	The "impact on the landscape and settlement pattern" are aesthetic values: not practical values such as the loss of agricultural land. Site CA1 is also a green belt situation: however, not a parcel but a significant amount of land and in balance with that, the loss of this site is of a lesser score.
411	There are significant concerns about impact on the landscape and settlement pattern as well as concerns that this would result in coalescence of settlements (Royal Tunbridge Wells and Pembury). The site is part of a Green Belt parcel the release of which would cause high harm. There are also highway concerns.	Coalescence between Tunbridge Wells and Pembury would be unnoticed, with this site being remote from the Pembury Road. In addition, the main A21 dual carriageway together with its embankments and foliage serve as a very effective barrier between the two settlements. This site in combination with sites 99 and 114 could provide a significant amount of housing. Site 411 has been described as "landlocked" without its own access, but this could be via site 99 onto the main A264 Pembury Road and hence the A21 giving this location excellent travel potential to the north, west and east without affecting Tunbridge Wells. Altogether the three sites total nearly 23 ha giving a TWBC yield of 654 houses at 30dph. At 50dph that raises to 1091 dwellings.	The "impact on the landscape and settlement pattern" are aesthetic values: not practical values such as the loss of agricultural land. Site CA1 is also a green belt situation: however, not a parcel but a significant amount of land and in balance with that, the loss of this site is of a lesser score.
395	This site would form a logical extension to the LBD and being located in proximity to the A21 and the A228 Pembury Road is considered a suitable site for an economic use. It also has an extant planning consent for a park and ride	The park and ride scheme has been dismissed and the site is now in the process of a planning application for a used car showroom. This is waste of an opportunity for housing in a key location where commuters can drive to their destination in most directions without impacting a settlement. For Tunbridge Wells centre the cycle lane would encourage that mode of transport if improved. There are bus services in all directions from the bus stops adjacent to the site. The site would be suitable for flats with parking on the ground floor. Four storey flats on that area could provide over 400 apartments of 50sq m.	Because a park and ride scheme from this ideal location was deemed unsustainable, it would be unlikely that a similar scheme could be implemented for CA1.

Appendix B. New Brownfield Site List

Our Ref No	Location	Parish	Size (hectares)	Potential Housing Yield at 30 dwellings per hectare (should increase to 50 dph for more urban sit	Description
1	Garages in Squirrel Way, off Sherwood Road	Tunbridge Wells	0.1	2	Garages at end of street, possibly council owned because neighbouring properties are/were council houses
2	Car park in The Beeches (road) off Sandhurst Road, behind The Church of Jesus Christ Latter Day Saints (Mormon Church)	Tunbridge Wells	0.1	4	Car park behind and probably belonging to church. Height probably ok for car park level plus two floors above because on sloping site.
3	Car park in Camden Road, between Beulah Road and Stone Street	Tunbridge Wells	0.2	5	Car park amongst houses, crowded situation. Might be ok for car park level plus one maybe two floors above.
4	Beach St Car Park – off Beech St / Camden Road	Tunbridge Wells	0.1	3	Car park amongst houses, crowded situation. Might be ok for car park level plus one maybe two floors above.
5	Garden Street Car Park, off Camden Road	Tunbridge Wells	0.1	2	Dilapidated small 3 storey multi storey car park. Fronts onto Garden Street, main part along Calverley Street. May be associated with Calverley House on other side of Garden Street (big white office block where Argos used to be). Explored, 105 spaces. Enquiries under way.
6	Salvation Army Car Park, on junction between Bayall Road and A264 Pembury Road	Tunbridge Wells	0.1	2	Housing yield shows here as 3 but site would have replaced 5 double fronted houses, or 10 houses further along the street.
7	Calverley Court Car Park, off Calverley Park Gardens	Tunbridge Wells	0.1	3	Car Park for the Salvation Army
11	Tunnel Road	Tunbridge Wells	0.1	4	Car park for NHS Highlands House
14	Blakeway, off Brook Road	Tunbridge Wells	0.0	0	Corn Exchange Garages, International Tile Store, TW Glass works. Industrial units which on GoogleMaps appear to be in use, but maybe they're now empty? Combined with Laural Garage in Goods Station Road they (Tile, Glass, Laurel) would make a good potential site.
15	Car Park at Culverden Square, off St Johns Road	Tunbridge Wells	0.7	20	3 small car parks
16	Car Park off North Farm Road / Holmewood Rd	Tunbridge Wells	0.1	3	Car parks behind houses on St Johns Road (near to old bus depot)
17	AXA PPP office car park, corner of Camden Rd & Forest Road	Tunbridge Wells	0.6	17	Car park behind and for houses in small close off North Farm Road, opposite High Brooms Station
18	Kings Head Pub, Five Oak Green	Five Oak Green	0.1	2	Large car park to south and west elevations
					Ruin of pub in the village. Probably space for 5 terraced houses

Our Ref No	Location	Parish	Size (hectares)	Potential Housing Yield at 30 dwellings per hectare (should increase to 50 dph for more urban sit	Description
19	Industrial building, Five Oak Green Road, opposite Sychem Lane, 5 Oak Green	Capel	0.1	2	Industrial building, in the past used for mobile crane depot, in good condition but no signs of current usage. Probably room for 3 or 4 terraced houses
20	Adjacent to Orchard Business Centre, Badsell Road, Five Oak Green	Capel	0.1	3	Site of old timber bungalow, demolished a few years ago. Probably room for 4 or 5 terraced houses.
21	Capel Village Hall, Falmouth Place, Five Oak Green	Capel	0.2	5	Car park for community centre. Ground floor for car park, first floor part car park for occupants remainder for accommodation, second floor as upper floor for flats.
22	Hawkwell Farmhouse, Maidstone Road	Pembury	0.3	8	Rundown farm on Maidstone Road near to Northern end of Northern Pembury Bypass. Probably room for four semis.
23	Tunbridge Wells Royals Indoor Bowls Club - Car Park, High Woods Lane.	Tunbridge Wells	0.1	4	Car park for the club
24	Sainsburys / Homebase - Car Park	Tunbridge Wells	1.5	45	Car park for these supermarkets
25	Behind WA Turners in Broadwater Lane - Car Park	Tunbridge Wells	0.2	6	Car park behind WA Turners in Broadwater Lane, accessing via Sainsburys carpark
26	Behind ABP, Broadwater Lane - Car Park	Tunbridge Wells	0.4	11	Car park behind ABP, Broadwater Lane
27	Linden Park Road, Tunbridge Wells - Car Park	Tunbridge Wells	0.1	3	Car park next to Sainsburys on corner of Linden Park Road junction with Montacute Road.
28	The Old Coach Park, Linden Park Road - Car Park	Tunbridge Wells	0.1	3	Coach park which might be now unused, next to Sainsburys.
29	Marks & Spencer / Halfords / Homesense, Off Dowding Way - Car Park	Tunbridge Wells	0.6	19	Car park for Halfords, Costa Coffee etc.
30	Wickes, Off Longfield Road - Car Park	Tunbridge Wells	0.2	7	Car park for Wickes
31	Asda, Longfield Road - Car Park	Tunbridge Wells	0.5	15	Car park for Asda, L shaped
32	Hobbycraft, Longfield Road - Car Park	Tunbridge Wells	0.1	3	Car park for Hobbycraft. Excludes access road
33	B&Q off Longfield Rd. - Car Park	Tunbridge Wells	1.1	34	Car park for B&Q etc.
34	John Lewis off Kingsland Way - Car Park	Tunbridge Wells	0.4	12	Car park for John Lewis
35	Tunbridge Wells Shopping Park off Longfield Rd (TK Maxx, Next, Argos) - Car Park	Tunbridge Wells	0.3	9	Car park for Argos etc.
37	Blantyre House	Goudhurst	5.7	172	Ex HM Prison, decommissioned
40	Land + Garages between Sir David Park and Keel Gardens	Southborough	0.1	4	Area of grass plus garages, amongst other houses. D&D report no ball games, garages for rent so not directly associated with houses.

Our Ref No	Location	Parish	Size (hectares)	Potential Housing Yield at 30 dwellings per hectare (should increase to 50 dph for more urban sit	Description
42	Car Park of Tunbridge Wells Leisure Centre, Off St Johns Rd	Southborough	0.7	21	Tun Wells leisure centre. May need to reduce housing number...
46	West of A21 half mile south of Kippings Cross roundabout	Brenchley & Matfield	13.0	390	Belongs to 'Other Government' according to http://map.whooinsengland.org/
47	West of Whetsed Road, north of last dwelling, 400m from railway bridge	Capel	0.6	18	Greenfield site used for grazing horses. One agricultural building on site. Level ground. Site is a triangular shape which is a logical infill.
48	West of A228 Maidstone Road opposite Capel Cottage Nursery	Capel	0.1	2	Unproductive corner of productive agricultural field. Adjacent to A228 and track used as footpath between Five Oak Green and Paddock Wood. East side of triangle borders the A228, west side neighbouring dwelling which has created this triangle. North site is 23m long on edge of field. Within the green belt.
49	North east of junction Sychem Lane and Alders Road	Capel	1.9	56	Builders storage site, Durtneils (co in liquidation). Roads on west and south boundary, Redwood Park estate to north, non-productive agricultural field to east. Flat site.
52	North of Badsell Road, east of Orchard Business Centre	Capel	0.6	18	In green belt. Unproductive field with Badsell Road to south, industrial building to west, older cottage and roundabout with A228 Maidstone Road to east, productive agricultural field to north (SHELAA site 308). Level site.
53	Langton Geen Village Hall Car Park, Speldhurst Road	Speldhurst	0.4	11	Village Hall car park
55	John St Car Park, just off west of St Johns Rd, opp side to Skinners School	Tunbridge Wells	0.2	5	Car park amongst houses, level site
56	East of St Johns Rd TW near to sports centre on opposite side of road	Tunbridge Wells	0.3	8	Car park of St John Lawn Tennis Club & Masonic Banqueting Centre, next to SHELAA site 237 (a playing field which shares the access to St Johns Rd)
57	Baldwins Lane, north off North Farm Road, opp High Brooms Stn (200mm on opp side of road)	Tunbridge Wells	0.3	9	Car parks of small companies, more suited to office space
58	North east of junction North Farm Road, Chapman Way, next to MOT centre.	Tunbridge Wells	0.2	6	0.19h but 0.26ha if include car park of neighbouring MOT centre. Suitable for office space. The site to the north east of TW MOT Centre is a good one, prime position for offices and car park on first level or two. Very crowded conditions all round here so car park space useful. Although I don't think it would be suitable for residential, as office space it could relieve the pressure elsewhere.

Our Ref No	Location	Parish	Size (hectares)	Potential Housing Yield at 30 dwellings per hectare (should increase to 50 dph for more urban sit	Description
58	North east of junction North Farm Road, Chapman Way, next to MOT centre.	Tunbridge Wells	0.2	6	0.19h but 0.26ha if include car park of neighbouring MOT centre. Suitable for office space. The site to the north east of TW MOT Centre is a good one, prime position for offices and car park on first level or two. Very crowded conditions all round here so car park space useful. Although I don't think it would be suitable for residential, as office space it could relieve the pressure elsewhere.
59	South side of A264, Langton Road opposite All Saints Church, Langton Green	Tunbridge Wells	1.3	39	Just within border of green belt, just outside border of AONB. Greenfield in-fill, level site/ logical infill. With water tower and reservoir to west, main Langton Road to north, dwelling and backs of properties in Broom Lane to east.
60	South side of Dowding Way and railway, accessed via lane by bridge	Tunbridge Wells	0.3	10	Site of Hanson Ready Mixed Concrete: still operational but seems an inappropriate location. Might incentives move them elsewhere? Can then fully utilise site 238 (playing field accepted) immediately adjacent.
64	Garage area at end of Birling Drive	Tunbridge Wells	0.8	24	This is a row of terraced single storey single garages at the end of a cul de sac. Approx 834m2
65	Clarendon Way	Tunbridge Wells	0.1	2	Grass area approx 15m x 50m
66	Willow Tree Road	Tunbridge Wells	0.0	1	Carpark approx 20m x 20m
67	Willow Tree Road	Tunbridge Wells	0.0	1	Carpark approx 15m x 30m
68	Chenies Close	Tunbridge Wells	0.1	3	Carpark approx 50m x 20m
69	Chenies Close	Tunbridge Wells	0.0	1	Carpark approx 20m x 20m
70	Chenies Close	Tunbridge Wells	0.0	1	Carpark approx 20m x 20m

Appendix C. Assessment Comparison of Site 190 vs. SS3 (Tudeley Village)

(Figure 1 enlarged for legibility)

COMPARING CA1 CAPEL TO THIS SAMPLE PEMBURY SITE...	
<p>Site ref: 190</p> <p>Site address: Land south east of Sandhurst Avenue, Pembury</p> <p>Developable area (ha): 3.52</p> <p>Parish: Pembury</p> <p>Site Type: Greenfield site adjacent to LBD</p> <p>Potential yield if residential: 106</p> <p>Issues to consider: Green Belt considerations; AONB (3 component parts); Landscape Sensitivity Study (part PE7, part MGB1); Ecological interest; Highway issues; Local Plan recreation designation on part of the site; In proximity to national cycle route; Potential road noise; Adjacent to limits to Built Development; ALC: Grade 3</p> <p>Site description: The site consists of an agricultural field. There are no existing buildings on the site. The site is adjoined by residential properties, the A21 and recreation fields and other fields. The site is mainly bordered by mature hedgerows. The site is naturally split in two by a hedgerow in the middle of the site. There are some mature trees and shrubs found within the hedgerows. The site is in proximity to Henwood Green Road and National Cycle Route 18. There is a gate that provides access to the main parcel of land from Hastings Road. There is pavement along Hastings Road. There is a Public Right of Way running through the middle of the site. The site is mainly flat with some minor undulation across the site. The site is at a higher level relative to the adjacent A21 and Hastings Road. The site is relatively enclosed, with some overlooking from the rear of adjacent residential properties.</p> <p>Suitability: Unsuitable: see reason below</p> <p>Availability: Available</p> <p>Sustainability Assessment: Negative land use score is influenced by the loss of green belt (moderate/high greenfield land, with grade 3 soils in the AONB. Landscape scores negative because of location of site relative to historic fields and historic farmsteads within an historic landscape in the AONB. Noise scores negatively because residents will be exposed to high noise levels and contribute to deterioration in the existing levels.</p> <p>Conclusion: This site is considered unsuitable as a potential site allocation.</p> <p>Reason: In conjunction with other site submissions at the eastern side of Pembury, there are significant highway impact concerns including on the nearby A21 major distributor road managed by Highways England.</p>	<p>Capel is all greenfield, and green belt, a significant distance from any LBD.</p> <p>All of CA1 is in the green belt too</p> <p>There was no sensitivity study carried out for CA1</p> <p>CA1 borders and would affect the view to and from the neighbouring AONB</p> <p>The open fields, hedgerows, woodland of CA1 all offer a rich ecology</p> <p>Highway issues: this Pembury site is next to the A21 so road infrastructure is immediately accessible: CA1 would require excessive transport infrastructure to be built.</p> <p>CA1 has not only Grade 3 agricultural land but significant areas of Grade 2 land, all in production. This Pembury field is not in productive use.</p> <p>There are people's homes on CA1: they have chosen to be there because they wish to be in a rural location, not surrounded by housing estates.</p> <p>The neighbouring properties at this Pembury site are already close to other houses and a dual carriageway.</p> <p>CA1 has mature hedgerows too, plus ancient woodlands.</p> <p>CA1 is not close to a cycle route and that infrastructure would need to be included in the plans to conform to current policies.</p> <p>For this site there is access to a main road immediately next to a dual carriageway, which does not apply to CA1, being in the middle of fields.</p> <p>There are no pavements in CA1 or the surrounding lanes until Tonbridge or Five Oak Green are reached.</p> <p>CA1 is open countryside: value seems to be place on a site being protected from view, but CA1 would be visible from miles around including the bordering High Weald AONB and a distant view Kent Downs AONB, the nearest point of which being only 3.6 miles away.</p> <p>Despite the above points, this Pembury site is deemed as unsuitable.</p> <p>CA1 green belt loss is categorised as 'high', has not only Grade 3 but Grade 2 soils and borders on the High Weald AONB.</p> <p>CA1 has historic fields, farmsteads and domestic buildings within its historic landscape associated with land in the neighbouring AONB.</p> <p>Existing residents within CA1 would be exposed to high noise levels, high intrusion of residents and dramatically increased traffic from the proposed development.</p> <p>Conclusion: compared to this ideal site in Pembury which has been rejected by TWBC, CA1 should be rejected on the same and greater grounds</p> <p>One significant conflicting reason that this Pembury site has been rejected: CA1 would need excessive infrastructure built and would impact the A21: but this Pembury site has been turned down because of 'significant highway concerns' on the A21 from this small site.</p>

Appendix D. Sources

(1): <https://spfaust.wordpress.com/2012/08/26/alt-erlaa-architecture-that-serves-a-social-purpose-social-housing-that-looks-feels-like-luxury-housing/>

(2): <https://www.stefanoboeriarchitetti.net/en/vertical-forest-en/wohnpark-alterlaa-harry-gluck/>

(3): <https://www.sciencefocus.com/future-technology/building-for-the-future-three-eco-cities-preparing-for-overpopulation-rising-sea-levels-and-air-pollution/>

Appendix E. Density Calculations

In calculating the potential uplift in housing yield when applying higher densities we modelled the following scenarios:

- Scenario 1: Increasing housing density by 33% for all sites with a housing density of <40 dph. Sites with a density of ≥ 40 dph are untouched. This is similar to increasing average density of 30dph to 40 dph across all sites
- Scenario 2: Increasing housing density by 66% for all sites with a housing density of <50 dph. Sites with a density of ≥ 50 dph are untouched. This is similar to increasing average density of 30dph to 50 dph across all sites

As stated, this simulation is by necessity top-down and relatively crude. Individual sites may support a much higher or in some cases no additional density. However, the simulations clearly illustrate the large opportunity to increase housing yield through higher increased density which we believe warrants further investigation.

Supporting files with density calculations by site are available on request.