

**Capel Parish Council response to the Sustainability Appraisal which accompanies the Tunbridge Wells Borough Council Draft Local Plan
(Regulation 18)**

Section, paragraph number(s), or site (including page number)	Comment
Non-Technical Summary p.2	<i>“Both of these concepts would involve some loss of Green Belt land” – “some” is understated. 600 acres will be lost and adjoining AONB will be harmed by the associated transport infrastructure.</i>
Non-Technical Summary p.2-3	<i>“The environmental objectives were found to produce either highly mixed, neutral or negative scores” – the scores are overwhelmingly negative in the strategic sites.</i>
Non-Technical Summary p.3	<p><i>“Tudeley village was the only reasonable location for a new settlement” – there are no published assessments for alternative locations such as Horsmonden site 144; so, this is an assertion rather than something clearly based on evidence.</i></p> <p><i>“Paddock Wood was the only reasonable location for an extension [...] but with land take in the Green Belt to the west of Paddock Wood, would provide a suitable scale of extension with benefits for the economic, environmental and social elements of sustainability” – even on your evidence, environmental and social elements are negatively impacted compared with the non-Green Belt options.</i></p>
Non-Technical Summary p.4	<i>“a cumulative impact assessment was undertaken for each parish or settlement location” – Table 25 (Chapter 8, page 67), contains the assessment scores for Capel Parish but lacks detail and underplays the local impact. The scores for AL/CA1, TP6 and AL/CA3 appear to be totally fabricated and bear no relation to the evidence base. Further comments can be found in the relevant section below.</i>
Chapter 1: Introduction – Purpose of this Report para 1.3.1 p.13	<p><i>“The report was then updated to take into account consultees’ comments and a final version prepared in October 2016. The Stage A Scoping Report should be referred to for a description of the original baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this report.”</i></p> <p>Capel Parish Council’s comments on the scoping report were not changed by TWBC despite being told by CPC that it contained material inaccuracies.</p>
Chapter 4: Methodology –	<i>“Table 2 below provides a list of additional relevant evidence studies that became available for consideration</i>

<p>Updates to baseline data para 4.1.2 and Table 2 p.20-21</p>	<p><i>during Stage B following publication of the Issues and Options Sustainability Appraisal in July 2017.</i></p> <p>Evidence studies outlined in Table 2 include; <i>Green Belt Study (Stage 2); Historic Landscape Characterisation and; Historic Environment Review</i>. Capel parish council was not consulted or made aware of these studies at the time they were done. Therefore, the local community had no opportunity to contribute.</p> <p>Table 2 also refers to a <i>Landscape Sensitivity Assessment (RTW, Paddock Wood, Horsmonden, Hawkhurst and Cranbrook)</i> completed during Spring 2017 and July 2018 but the assessment did not include Capel where 4000+ houses are proposed to be built on the Green Belt – why?</p>
<p>Chapter 4: Methodology – Updates to Plans, Policies and Programmes para 4.2.1 and Table 4 p.22-24</p>	<p>Table 4 refers to the <i>KCC Draft Minerals and Waste Local Plan</i> but incorrectly states that “<i>Sites at Moat Farm and Stone Castle, Five Oak Green are adjacent to the boundary with TWB</i>”. Both Moat Farm and the entrance to and part of Stone Castle are within TWB and adjacent to the proposed site in Tudeley STR/CA 1.</p>
<p>Chapter 4: Methodology – Sustainability Objectives and Scoring Method Table 6 p.26</p>	<p>The Sustainability Objectives for Tunbridge Wells Borough are outlined in Table 6 and include the following:</p> <ul style="list-style-type: none"> No. 1 “Reduce air pollution” No. 2 “Protect and enhance biodiversity and the natural environment” No. 4 “Reduce carbon footprint and adapt to predicted changes” No. 10 “Preserve and enhance historical and cultural heritage assets” No. 12 “Protect soils, and reuse previously developed land and buildings” No. 13 “Protect and enhance landscape and townscape” No. 14 “Reduce noise pollution” No. 15 “Reduce the impact of resource consumption” No. 17 “Improve travel choice and reduce the need to travel by private vehicle” No. 18 “Reduce waste generation and disposal” No. 19 “Manage flood risk and conserve, protect and enhance water resources” <p>Policies AL/CA 1, AL/CA 2, AL/CA 3 & AL/PW 1 and TP6, are incompatible with all of the above objectives and</p>

	<p>therefore should be removed from the Draft Local Plan.</p> <p>Objective No. 4 in particular reflects the resolution made by Tunbridge Wells Borough Council on 17 July 2019 in which it recognised “that it has a responsibility to take a firm lead on reducing the council’s and the wider borough’s carbon emissions” and resolved to “Ensure that forthcoming plans and strategies (including the Local Plan and the next iteration of the Five-Year Plan) set out ways in which the Council can make its contribution to reduce carbon emissions, the degradation of the environment and combating climate change by agreeing an ambition to make the Council’s operations carbon neutral by 2030.”</p> <p>Not only are Policies AL/CA 1, AL/CA 2, AL/CA 3 & AL/PW 1 and TP6, incompatible with the Sustainability Objectives outlined above, but they are incompatible with the declaration made by Tunbridge Wells Borough Council on 17 July 2019 to recognise global climate and biodiversity emergencies and its ambition to make the Council’s operations carbon neutral by 2030. These policies should be removed from the draft Local Plan.</p>
Chapter 4: Methodology – Sustainability Objectives and Scoring Method Table 6 p.26	With regard to Sustainability Objective No. 11 “Provide sufficient housing to meet identified needs” – this is unclear. To meet whose identified needs? The government? TWBC? The local community?
Chapter 4: Methodology – Sustainability Objectives and Scoring Method para 4.3.2 p.26	<i>“Scoring for the biodiversity objective was determined by the following three indicators; Sites of local biodiversity value included undesignated habitat; The Ashdown Forest SAC and SPA; Sites of Special Scientific Interest and associated risk zones”</i> – how is it fair to score a biodiversity objective against the Ashdown Forest when the strategic sites have a very different geology, and therefore ecosystem, flora and fauna. They are sites of local biodiversity and should be measured on their own terms.
Chapter 4: Methodology – Sustainability Objectives and Scoring Method para 4.3.6 p.27	“Higher weightings were given to issues that were legislatively driven, of critical importance to the borough and where finite assets were concerned.” - this surely has skewed the appraisal in favour of the maximum number of houses in all cases – the appraisal has been thus predetermined by the council, as housing need according to TWBC outweighs all environmental and other considerations
Chapter 4: Methodology – Sustainability Objectives and Scoring Method para 4.3.9 p.27	<i>“Every effort was made to predict effects accurately; however, in some cases this was inherently challenging given the high level nature of the alternatives under consideration.”</i> – if the predictions are wrong the effects will be felt by the local community and not by the planners.

Chapter 4: Methodology – Sustainability Objectives and Scoring Method para 4.3.9 p.27	<i>“realistic mitigation measures in line with the Draft Local Plan were assumed to be in place when scores were applied”</i> – but these are not in place and there is no guarantee they will ever be in place. Scores should reflect the current situation.
Chapter 4: Methodology – Sustainability Objectives and Scoring Method para 4.3.11 and Table 7 p.28	Table 7 outlines the alterations to the scoring method during Stage B. Under Sustainability Objective “Biodiversity” it states that <i>“Consideration was given to the requirement for net gains for nature when scoring the biodiversity objective for borough-wide strategies”</i> the reasoning being <i>“This reflects the changes to the NPPF since the Issues and Options stage. A more precautionary approach was adopted for site level assessments, as the policy is in its infancy and it was not clear whether benefits would be delivered on or off site.”</i> – it is not clear what approach was taken by TWBC here; where is the net gain for nature when 600 acres of Capel Parish is covered by housing?
Chapter 4: Methodology – Sustainability Objectives and Scoring Method para 4.3.13 p.29	<i>“Because topics and objectives cannot be directly weighed against one another, readers are discouraged from ‘adding up’ positive or negative scores to give an overall score for a policy, strategy or site”</i> – what is the point of scores if they can’t be added up? They are masquerading as objective criteria but in reality, the subjective written commentary is the basis on which decisions are made.
Chapter 5: Compatibility Testing of Strategic Objectives – Method para 5.2.3 p.30	<p><i>“Where the term ‘appropriate’ is used in relation to Green Belt release, it refers to the land that contributes weakly to Green Belt objectives or to the strategic reasons outlined in the Green Belt Topic Paper.”</i> – “weakly” is subjective and in the case of PW1/CA3 not borne out by evidence. Moreover it is not clear which ‘part’ of the Metropolitan Green Belt (MGB) is being referred to. One of the differences between Paddock Wood and Capel is that Capel is in the MGB and Paddock Wood is not. The parish boundary is also the limit to built development of PW and the MGB boundary. CPC would argue this is the most important part of the MGB in Capel parish as it prevents the convergence of Paddock Wood and Five Oak Green. In other words, it maintains a sense of openness and separateness between the two communities which is the whole point of the MGB – it does not therefore ‘weakly’ contribute to the MGB.</p> <p>The stretch of the road further west of AL/CA 3 between Five Oak Green and the A228 does not give this impression to the same degree; it doesn’t give a clear sense of separateness between the village and its surroundings. But once you cross the A228 it is very different – after a few houses near the roundabout there is open countryside right up to the LBD of Paddock Wood. The boundary between the two parishes is at its clearest here – yet the proposal of the planners to end the MGB at the A228 would destroy this clear</p>

	<p>distinction between rural and urban which is the main function of the MGB. This most strategic section of the MGB would be destroyed and the two settlements would to all appearances have converged.</p>
<p>Chapter 5: Compatibility Testing of Strategic Objectives – Method para 5.2.3 and Figure 4 p.30-31</p>	<p>Figure 4 outlines the Strategic Objectives of the new Local Plan. Capel Parish Council has the following concerns in relation to these:</p> <p>Objective 6 is <i>“To protect the valued heritage, and built and natural environments of the borough, including the AONB and to achieve net gains for nature”</i> – the valued heritage and natural environments in Capel Parish are not being protected, for example the Grade 1 Listed Somerhill; There is no evidence of any net gains for nature either.</p> <p>Objective 7 is <i>“To strategically release appropriate land from the Green Belt through a plan-led approach, and to increase public accessibility, and to protect the openness of remaining Green Belt land”</i> – it is unclear how an increase in public accessibility can be achieved unless it means building access roads over the remaining MGB; there are no measures to protect the remaining MGB land.</p> <p>Objective 8 is <i>“To tackle climate change and minimise the impact of development on communities, the economy and the environment with carefully considered design and by embracing technology such as renewable energy generation”</i> – this conflicts with TWBC’s recently adopted policy as a climate change council (see notes above)</p> <p>Objective 9 is <i>“To establish garden settlements as a model for the future delivery of development in the borough”</i> – it is troubling to see this as a model for even more development in the future, presumably in the same parish.</p>
<p>Chapter 5: Compatibility Testing of Strategic Objectives – Results para 5.3.1 and Table 8 p.32</p>	<p>Table 8 Table 8 purports to test compatibility of Local Plan objectives with Sustainability Appraisal Objectives.</p> <p>In relation to Local Plan Objective 1 (Development needs), Table 8 shows compatibility with all Sustainability Appraisal Objectives but it would not have been possible to assess compatibility with either Sustainability Appraisal Objective 2 (Biodiversity) or 13 (Landscape) as full assessments of the current situation were not undertaken for the strategic sites.</p> <p>To argue that Local Plan Objective 8 (Climate Change) is compatible with all the Sustainability Appraisal Objectives is just an assertion. How can that be when 600 acres of open farmland is to be built over and a</p>

	<p>road to be driven through the AONB?</p> <p>The compatibility of the Local Plan Objective on Garden Settlements (Objective 9) with Sustainability Appraisal Objectives is a series of ?'s What does that tell us?</p>
<p>Chapter 5: Compatibility Testing of Strategic Objectives – Results Table 9 and para 5.3.3 p.33-34</p>	<p>Table 9 outlines the number of Sustainability Objectives that are compatible with Local Plan Objectives. There is a very high level of uncertainty in relation to key objectives.</p> <p>For example;</p> <p>Local Plan Objective 2 (Infrastructure) is compatible with only 8 out of 19 Sustainability Appraisal Objectives (42% compatible)</p> <p>Local Plan Objective 3 (Travel) is compatible with only 8 out of 19 Sustainability Appraisal Objectives (42% compatible)</p> <p>Local Plan Objective 4 (Housing) is compatible with only 4 out of 19 Sustainability Appraisal Objectives (21% compatible)</p> <p>Local Plan Objective 7 (Green Belt) is compatible with only 4 out of 19 Sustainability Appraisal Objectives (21% compatible)</p> <p>Local Plan Objective 9 (Garden Settlements) is compatible with only 5 out of 19 Sustainability Appraisal Objectives (26% compatible)</p> <p>It is, therefore, totally wrong to simply conclude that “the majority (nine out of ten) of the Local Plan Objectives are more compatible than incompatible with the Sustainability Appraisal objectives.”</p> <p>If the outcome is uncertain then it cannot be ruled out that it is incompatible. The approach is wrong, and the Sustainability Appraisal is therefore unsound.</p>
<p>Chapter 5: Compatibility Testing of Strategic Objectives – Results para 5.3.6 p.34</p>	<p><i>“Strategic Objective 10 (Neighbourhood Planning) is also deemed to be compatible with all sustainability objectives because locally-led policies within Neighbourhood Plans are expected to demonstrate how they will contribute to achieving sustainable development”</i> – this is speculation. If the Neighbourhood Plan content is dictated by the Strategic Policies of the Local Plan, given the high levels of uncertainty previously identified, it cannot be claimed that there will be compatibility.</p>

<p>Chapter 5: Compatibility Testing of Strategic Objectives – Results para 5.3.8 p.34</p>	<p>“Compatibility of sustainability objectives with Local Plan Strategy 9 (Garden Settlements) are based on those applied to Growth Strategy 4 in the Issues and Options Sustainability Appraisal” – why is compatibility of sustainability objectives with Local Plan Strategy 9 based on those applied to Growth Strategy 4 (the ‘Growth-Corridor Led Approach’) and Growth Strategy 5 (New Settlement Growth)?</p> <p>The same paragraph goes on <i>“a clearer picture is now available on what sort of development would be created in a garden settlement. However, no presumption about potential locations for garden settlements is made for this element of the Local Plan thus several uncertain impacts are still predicted”</i></p> <p>There are no details on <i>“what sort of development would be created”</i> apart from that it will follow a master-planned approach. if, as the Sustainability Appraisal states on page 5, <i>“Tudeley village was the only reasonable location for a new settlement”</i> and this led to the inclusion of the site in Tudeley in the DLP as Policy AL/CA 1, then it is unclear why a presumption was not made that the location would be used in order to assess compatibility (or otherwise) of Local Plan Objective/Strategy 9 with the Sustainability Objectives. A proper assessment of a potential site would have led to certainty about compatibility. There is no justification for failing to properly assess the site at Tudeley against the sustainability criteria to achieve certainty.</p>
<p>Chapter 6: SA of the Spatial Development Strategy – Background and Method para 6.1.5 p.36</p>	<p><i>“Although these recommendations were felt to be the most useful output from the Issues and Options SA, it was noted that a slight preference was recorded for Growth Strategy 5 and that Growth Strategy 3 was slightly less positive than the other strategies”</i> – this is misrepresentation.</p> <p>The Issues and Options Consultation Statement, available on the Tunbridge Wells Borough Council website at https://beta.tunbridgewells.gov.uk/local-plan/issues-and-options provides an overview of the Issues and Options consultation which ran from 02 May to 12 June 2017. This consultation included the question <i>“Please let us know your preferred option or combination of options in order of preference”</i>. The statement provides a summary of responses which states:</p> <p><i>“289 responses were received to this question in terms of ranking Strategic Options in order of preference. However, a significant number of these respondents stated they preferred a combination of Options as set out in Question 10a below. One respondent stated they did not agree with any of the Options.</i></p> <p><i>Of those who ranked the Strategic Options:</i></p>

	<p>116 respondents (about 60%) ranked Option 4 (Growth Corridor-led Approach) as their most preferred Option;</p> <p>34 respondents (about 18%) ranked Option 5 (New freestanding settlement) as their most preferred Option;</p> <p>26 respondents (about 13%) ranked Option 1 (Focused Growth) as their most preferred Option;</p> <p>16 respondents (about 8%) ranked Option 3 (Dispersed Growth) as their most preferred Option;</p> <p>2 respondents (about 1%) ranked Option 2 (Semi-dispersed Growth) as their most preferred Option.</p> <p>From these responses, it can be concluded that of those who ranked the Strategic Options, the majority of 60% of respondents chose Option 4 (Growth Corridor-led Approach) as their preferred Option.”</p> <p>It is clear from this statement that rather than a slight preference for Growth Strategy 5, Three times as many people preferred Growth Strategy 4. Only 8% preferred Growth Strategy 3.</p>
<p>Chapter 6: SA of the Spatial Development Strategy Background and Method para 6.1.8 p.36</p>	<p>“Consideration was also given to a further option: growth that only partially meets identified needs. However, the iterative process through which sites were selected for development potential, including through the SA of sites, indicate that there is capacity in the borough to meet housing targets whilst still having due regard to AONB and Green Belt policies. Therefore, this option is not considered to be a reasonable alternative in the context of the NPPF at this point”</p> <p>If there is capacity in the borough to meet housing targets whilst still having due regard to AONB and Green Belt policies, why is development proposed which has a significant and detrimental impact on AONB and which results in the loss of 600 acres of Green Belt land? Option 9: Growth that only partially meets identified needs MUST be considered properly in the context of a Garden Settlement with a specified location which has been assessed against the sustainability objectives.</p>
<p>Chapter 6: SA of the Spatial Development Strategy Background and Method para 6.1.11, Figure 5 and Table 13 p.36-37</p>	<p>“Potential sites for garden settlements and urban extensions in the borough are shown in Figure 5. The locations underwent the same filtering process as that for sites with potential for small scale development (see section 8.1) and are described in Table 13 with an explanation of why options were not considered reasonable where applicable”</p> <p>The explanation of the approach taken by SA in relation to Capel (Ref 2 in Table 13) is “Land is outside of key constraints (except Green Belt) with potential for useful transport links”</p>

	<p>The ‘potential’ for useful transport links cannot be realised. There will be no new railway station and plans for the A228 strategic transport link (Colts Hill bypass) (Policy TP 6) and the proposed link route which is to run from the proposed development at Tudeley (Policy AL/CA 1) to the Colts Hill Bypass (Five Oak Green Bypass) are ill-thought out and will result in further significant detrimental impact on the local landscape with little mitigating effect or benefit to residents of the parish of Capel.</p> <p>The explanation of the approach taken by SA in relation to Horsmonden (Ref 4 in Table 13) is <i>“Landscape sensitivity would require further consideration because the site is outside (but adjacent to) the AONB. However, the site was considered to have severe access difficulties that would render this alternative unviable and thus not a reasonable alternative.”</i></p> <p>There is thus only very limited information on why alternative strategic sites to Capel were rejected (far less information than on small scale sites rejected) e.g. there is no comparison between site 144 in Horsmonden and its ‘severe access difficulties’ [not explained] and the sites chosen; it is not measured against the comparative negative criteria in Tudeley and East Capel despite the latter being in the Green Belt and in Tudeley’s case also bordering on AONB</p> <p>Paddock Wood (Ref 12 in Table 13) includes sites in Capel as well as PW. The explanation of the approach taken by the SA is <i>“Land is outside of key constraints (except flooding and Green Belt) and has useful transport links”</i> it appears that these constraints are conveniently less important for the purposes of the SA? The transport links are already overused and improvements are required. Please see our comments above in relation to the damage to the AONB in the event that the A228 strategic transport link (Colts Hill bypass) (Policy TP 6) and the proposed link route which is to run from the proposed development at Tudeley (Policy AL/CA 1) to the Colts Hill Bypass (Five Oak Green Bypass) are to go ahead.</p>
<p>Chapter 6: SA of the Spatial Development Strategy Results para 6.2.9 p.41</p>	<p><i>“in the light of the various options, together with the findings of further studies, consideration of availability of sites and the views of parish and town councils, a preferred growth development strategy has been formulated”</i></p> <p>This is misleading. The view of Capel Parish Council was only sought after this strategy had been adopted. At no point has CPC expressed a view supportive of this strategy. CPC’s view is that there is no need to build housing in the Green Belt and that Tunbridge Wells Borough Council’s strategy is flawed.</p>

	<p>Para 6.2.9 sets out that the Spatial Development Strategy has the following elements:</p> <p><i>“Provision for infrastructure-led, housing needs in line with Growth Strategies 3 and 5 including significant expansion of Paddock Wood and a new, standalone garden settlement in Capel Parish allowing for approximately 14,000 new homes over the plan period”</i></p> <p><i>“Provision for economic needs based on Growth Strategies 1, 2 and 4 including provision for approximately 14 hectares of employment land”</i></p> <p><i>“Provision of new local facilities and services where required to support residential development in smaller settlements“</i></p>
<p>Chapter 6: SA of the Spatial Development Strategy – Results para 6.2.10 and Table 15 p.42</p>	<p>Table 15 shows the scoring for the SA of the Draft Local Plan spatial distribution strategy referred to above.</p> <p>The score for Biodiversity is 0 or ‘neutral’ with the commentary <i>“Small losses offset by potential large gains on strategic sites. Net gains policy will also bring benefits. Not considered at site level as gains could be offsite or out of parish”</i> – this is speculative. Given the paucity of information on biodiversity in general it is simply not possible to justify the statement of small losses and potential gains. This is unsound.</p> <p>Biodiversity should be ‘very negative’ (---) not ‘neutral’ (0) given the loss of Biodiversity resulting from Policies AL/CA1, TP6 and AL/CA3.</p> <p>Only Air, Climate Change, Heritage, Land use and Landscape are scored as ‘negative’ or ‘very negative’.</p> <p>Noise, Resources, Services, Travel and Water are all marked with a question mark which TWBC represents a ‘mixed’ score.</p> <p>These scores do not reflect the negative impact on Capel Parish where 4,300 (63%) of the proposed housing shortfall is planned. Much of this will have very limited impact on other parts of the borough so this cross borough impact measurement is flawed.</p> <p>Travel should be ‘very negative’ (---) not ‘?’ as there will be an additional 25,000 cars on the borough’s roads with inadequate public transport (no new railway stations). Water should be ‘very negative’ (---) not ‘?’.</p> <p>Clearly there will be huge demand on existing resources and an increased flood risk for hundreds of homes. It is unacceptable to simply state that the impact is ‘uncertain’ in order to massage the data.</p>

<p>Chapter 6: SA of the Spatial Development Strategy – Results para 6.2.11 p.42</p>	<p><i>“the environmental objectives score well relative to alternative strategies”</i></p> <p>This is only because TWBC has chosen to score the majority of the environmental objectives as a ? in order to ensure the outcome of the Sustainability Appraisal reflects its chosen strategy.</p>
<p>Chapter 6: SA of the Spatial Development Strategy – Results para 6.2.14 p.43</p>	<p><i>“it was logical to assess Paddock Wood for a potential urban expansion and especially because the other, larger settlements of RTW, Southborough, Hawkhurst and Cranbrook have many constraints. Similarly, the largely constraint-free area of land submitted in Capel parish was logical to assess as a potential garden settlement location”</i></p> <p>There is no detailed explanation as to why the other large scale sites were rejected. Capel Parish Council believes that Tudeley was not the original choice as a standalone garden settlement, and that the choice was more to do with the single landownership than the absence of constraints. The nature of land ownership is not a good argument for rejecting a site outside the Green Belt for one inside it.</p>
<p>Chapter 6: SA of the Spatial Development Strategy – Results Garden Settlement Development Scale paras 6.2.15-6.2.14 p.43</p>	<p>These paragraphs relate to proposals for a larger scale development at Tudeley (Option 2) which consists of approximately 5,000 dwellings extending southwards further into the Green Belt and into AONB. Capel Parish Council strongly objects to any proposal to consider the larger development within the Local Plan, which, if it were to occur, would destroy virtually all the MGB between Tonbridge and Five Oak Green.</p> <p>Capel Parish Council is extremely concerned that Tunbridge Wells Borough Council ever considered a development of this scale on MGB and AONB, and seeks reassurance that Option 2 will not be reconsidered at a later date.</p>
<p>Chapter 6: SA of the Spatial Development Strategy Results Garden Settlement Development Scale para 6.2.17, Table 16 and paras 6.2.18-6.2.19 p.44-46</p>	<p>The sustainability appraisals for the two options at Tudeley are shown in Table 16 and the findings summarised in paragraphs 6.2.18-6.2.19 which appear to justify a smaller settlement on the grounds that a larger one would be even worse: most of the adverse effects are caused by the nature of the development itself – mitigating this by not building something even larger is ridiculous. The only sustainability comparison is between the two Tudeley options – there are no comparisons with other options the council considered, particularly those outside the Green Belt.</p> <p>As with Table 15, the use of ? as a score for any/all of the potentially negative scores is designed to skew the Sustainability Appraisal in favour of TWBC’s chosen strategy.</p> <p>It is absurd to suggest that a development of either size would have an uncertain or ‘mixed’ effect on Air</p>

	<p>Quality, particularly when the commentary goes on to acknowledge the high risk of deterioration to air quality which, in Tudeley is already on the cusp of exceeding the WHO target for acceptable levels of Fine particulate matter (PM2.5). Option 2 should be ‘very negative’ {---} and Option 1 ‘negative’ (--).</p> <p>The scoring for Biodiversity is understated with no consideration of the location in question. The commentary simply states “<i>There is no risk the Ashdown Forest and neither option is within an SSSI Impact Risk Zone</i>” which demonstrates the lack of diligence and understanding when scoring this Objective.</p> <p>Travel is scored as ‘very positive’ with commentary “<i>The Travel scores are applied following a similar logic to air quality whilst also considering new bus routes and relatively easy access to train stations</i>” this is not logical. There is no access to train stations, there are no bus routes in place and no pavements. The infrastructure will not be in place for several years after building begins. Option 2 should be ‘very negative’ {---} and Option 1 ‘negative’ (--).</p>
<p>Chapter 6: SA of the Spatial Development Strategy Results Urban Extension Development Scale paras 6.2.20-6.2.26, p.46</p>	<p>These paragraphs contain details of the four options considered for Urban Extension Development. There are two options which would not have involved building on the MGB – TWBC has rejected these in favour of one that does. Option 1 has least impact in terms of a range of environmental factors.</p>
<p>Chapter 6: SA of the Spatial Development Strategy Results Urban Extension Development Scale Figure 7 and Table 17 p.46-48</p>	<p>The sustainability appraisals for all four options are shown in Table 17. Capel Parish Council has the following comments:</p> <p>The effect on local biodiversity will be much greater than stated (even if it has no effect on the Ashdown Forest – surely this is a flawed and ludicrous measurement given that it is miles away with a completely different geology soils, and flora and fauna!). 1,500 houses on option AL / CA 3 is not going to enhance biodiversity as stated – the presence of several hundred more domestic cats will see to that!</p> <p>Option 1 has the least effect on climate change – but the council seems only paying lip service to this goal despite proclaiming themselves a climate change council</p> <p>Option 1 has less effect on heritage than 2 and the setting of the Medieval moated Badsell Manor needs to be accounted for. Not clear whether this was included in the assessment.</p> <p>Option 1 would have less effect on land use and noise than option 2; and giving 1 and 2 the same score for</p>

	<p>landscape seems illogical given the 201 acres extra lost to this scheme. The environmental scores are much more negative overall for option 2 than 1 and there is an argument that the difference has been underplayed in this assessment.</p>
<p>Chapter 6: SA of the Spatial Development Strategy Results Urban Extension Development Scale paras 6.2.27-6.2.30 p.49</p>	<p>The findings of the SA of the four options are summarised in paragraphs 6.2.27-6.2.30.</p> <p><i>“It is fair to conclude that Options 1 and 2 have approximately similarly outcomes overall”</i> – this is based on a flawed assessment, see our comments above.</p> <p><i>“housing is of great importance to the council in meeting targets and options”</i> - It is clear that housing is the factor that motivates the council despite the impact on the MGB of option 2. This reads like TWBC chose the option they wanted and skewed these criteria to justify it. Environmental factors should have been taken more seriously and have been underweighted for the MGB section to the West of Paddock Wood. No exceptional circumstances have been put forward for building on MGB outside Paddock Wood in Capel Parish when even the council realises there are alternatives which would leave the MGB intact.</p> <p><i>“but also improve the flood risk for existing residents must be highly weighted”</i> – this refers to Five Oak Green Flood Alleviation as well as PW. This has been used twice in this SA both in East Capel and Tudeley to justify development. This despite option 2 having been selected before TWBC were aware in Feb 2019 of this scheme. Option 2 would ALSO require building on the most flood prone part of Capel Parish – so improving the flood risk as a highly weighted factor for the choice does not make any sense.</p>
<p>Chapter 7: SA of the Strategic Policies Background and Method para 7.1.4 p.50</p>	<p><i>“Policy STR 4: The NPPF provides thorough coverage of Green Belt issues although, as stated above, the policy is based on making the releases set out in the Draft Local Plan, so is appraised on that basis, effectively as a cumulative assessment of the relevant individual development allocations. As this is a cumulative assessment, no specific alternative approach is identified. Rather, the appraisal provides an indication of the sustainability impacts of the proposed releases, which are each subject to their own appraisal”</i></p> <p>No specific alternative approach is identified, therefore, it is impossible to judge the chosen strategic sites against any possible alternatives.</p>
<p>Chapter 7: SA of the Strategic Policies Results para 7.2.1 and Table 18 p.51-52</p>	<p>Table 18 details the SA findings for Strategic Policies; STR 2 Sustainable Development; STR 3 Master planning; STR 4 Green Belt and; STR 5 Infrastructure</p> <p>This Table highlights the negative impact of Policy STR 4 Green Belt across the Borough. The impact on Capel</p>

	<p>Parish where all the Green Belt development is planned will be disproportionately greater. Why was there no cumulative impact assessment on Capel Parish alone as all the lost Green Belt is here?</p> <p>Once again TWBC has substituted realistic scores (which would all be negative) for 0 or 'neutral' scoring for the key environmental Sustainability Objectives; Air; Biodiversity; Landscape; Noise; Services and facilities; Travel; Waste and; Water. This drives the SA scoring closer to supporting their chosen strategy.</p>
<p>Chapter 8: SA of the Potential Development Sites Background and Method para 8.1.4 p.55</p>	<p><i>"Sites filtered out at this initial first stage assessment stage include sites: [...] That are wholly Ancient Woodland or a significant proportion of the site is Ancient Woodland, significantly reducing the developable area of the site"</i></p> <p>The site for Policy AL / CA 2 has a significant portion of ancient woodland and should have been filtered out at the initial first stage assessment. Why therefore was it included?</p> <p><i>"Sites filtered out at this initial first stage assessment stage include sites: [...] About which there is significant landscape concern, which it is considered is unlikely to be overcome"</i></p> <p>What is totally unclear is what this is based on given that there has been no comprehensive Borough wide landscape assessment. On this basis the SA cannot be sound.</p> <p>There is no filter for biodiversity interests beyond considerations relating to designated sites.</p>
<p>Chapter 8: SA of the Potential Development Sites Capel (including Tudeley Village) Figure 10 p.66</p>	<p>Figure 10 demonstrates the significant and excessive proportion of Capel parish being considered for development. No other parish is subjected to such pressures for development. It is completely disproportionate. The designation 'Reasonable' is wrong.</p>
<p>Chapter 8: SA of the Potential Development Sites Capel (including Tudeley Village) Table 25 p.67</p>	<p>Table 25 details the SA scores for allocated sites in Capel Parish.</p> <p>With regard to Policy TP 6, the scores in Table 25 cannot be reconciled with the evidence. A bypass of this nature which displaces AONB land, will necessitate CPOs and includes roundabouts onto single lane, unsuitable for HGV, weight restricted roads should be scored as either 'negative' or 'very negative' for the following sustainability objectives; Air, Biodiversity, Climate Change, Health, Heritage, Land use, Landscape, Noise and Water.</p> <p>With regard to STR / CA 1, the scores in Table 25 appear to have been totally fabricated. The SA should be</p>

	<p>scored as either ‘negative’ or ‘very negative’ for the following sustainability objectives; Air, Biodiversity, Climate Change, Health, Heritage, Land use, Landscape, Noise, Travel, Waste and Water.</p> <p>The commentary is biased. Without proper assessments of some factors in the first instance and given that there is an emphasis on development rather than conservation and respect for natural beauty and existing ecosystems there is bound to be a greater number of positives.</p> <p>With regard to AL / CA 2, how can Heritage be 0 or neutral when the Policy affects the views to and from Somerhill – a Grade 1 listed building?</p> <p>With regard to AL / CA 3 a positive biodiversity score for AL / CA 3 is hard to believe if this referred to the Capel section alone. As with AL / CA 1, the SA should be scored as either ‘negative’ or ‘very negative’ for the following sustainability objectives; Air, Biodiversity, Climate Change, Health, Heritage, Land use, Landscape, Noise, Travel, Waste and Water.</p> <p>The cumulative assessment for Capel Parish – STR/CA 1 (cumulative) – notes the negative scores for environmental objectives which TWBC clearly believe are a cost worth paying; and therefore, ultimately less important in the assessment. This chart is assessing cumulative effects on Capel but includes an area mostly in Paddock Wood. The betterment for flooding in Five Oak Green could still be paid for under option 1 for PW.</p> <p>It is clear that one parish is bearing a hugely disproportionate impact of this plan even on TWBC’s figures. The environmental impact of the development in MGB (with these three sites under Policies AL / CA 1; AL / CA 2 and AL / CA 3) in one small parish, when set alongside the impact of Policy TP 6 on the AONB with the associated transport infrastructure for these schemes which will carve its way through the remainder of Capel Parish in a way this Sustainability Appraisal has yet to spell out, will disproportionately damage the quality of life for Capel residents over the coming years. Essentially the council needs to rethink its strategy and avoid building on MGB, to protect the quality of life for its residents in Capel who cannot be expected to bear the full burden of development for the whole borough. This SA is based on the needs of the Borough as a whole it pays little attention to the cumulative effect on Capel Parish. Even this table envisions the positive impact for future residents. It does not reflect the impact for current residents.</p>
Chapter 8: SA of the Potential Development Sites Paddock	Table 27 SA scores for allocated sites in Paddock Wood Parish. Our comments above in relation to Policy AL / CA 3 (Table 25) are repeated here under Policy AL / PW 1; The SA should be scored as either ‘negative’ or

Wood Table 27 p.70	<p>'very negative' for the following sustainability objectives; Air, Biodiversity, Climate Change, Health, Heritage, Land use, Landscape, Noise, Travel, Waste and Water. What justification is there for scoring Biodiversity "<i>as slightly positive overall to reflect the large improvements that can be made with AL / PW 1</i>" – when there are no 'large improvements' proposed?</p> <p>Note the negative score for Climate Change in relation to AL/CA3 which contrasts with the limited impact of the other sites in the town.</p>
Chapter 8: SA of the Potential Development Sites Horsmonden Table 39 p.87-88	Table 39 lists 'reasonable alternative sites in Horsmonden Parish' but is missing site 144, which is referred to on page 38 of the SA and was originally seen an option for strategic development. Why was this site not properly assessed? See our comments above.
Chapter 10: Conclusion para 10.1.1 and Table 73 p.129	<p>Table 73 outlines a complete SA of all elements of the Draft Local Plan.</p> <p>In this SA, the score for climate change is a ? – is this really sustainable for a climate change council? The impact of development in the MGB must be a big negative contribution. Table 73 suffers from the same speculation as other tables in that the baseline data has not been properly assessed / scored and the majority of environmental objectives score as mixed with neutral scores. It is unacceptable to simply put a question mark out of reluctance to acknowledge a clear negative impact. It is obvious that the following sustainability objectives should record a negative score for the reasons outlined in this response; Air, Biodiversity, Climate Change, Heritage, Noise, Travel, Waste and Water. If these objectives had been properly scored, the SA would be more credible and accurately reflect the poor sustainability of the Local Plan.</p>
Chapter 10: Conclusion Table 74 – Biodiversity p.131	<p>Table 74 outlines the impact of the overall Draft Local Plan on each Sustainability Appraisal objective.</p> <p>Under Biodiversity, it is stated that "<i>The Biodiversity objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is principally because the large area of greenfield land take that would be required for construction of new dwellings is likely to create pressure on existing habitats. However, Strategic Objective 6 (Environment) offers protection to "valued natural environment" and expects net gains for nature thus any losses would be more than offset</i>"</p> <p>There is no evidence presented for this assertion and the impact on biodiversity must be measured on each</p>

	<p>parish not across the borough. The flora and fauna of the Low Weald of Tudeley and East Capel cannot be replaced by compensatory measures elsewhere – it is a unique landscape with its own species.</p> <p>The comments in Table 74 in relation to biodiversity are dependent on tables that are faulty for reasons given above; namely that without the proper initial assessment it is not possible to understand the impact on this key issue. Similar comments also apply to landscape.</p>
Chapter 10: Conclusion Table 74 - Heritage p.139	<p>Under Heritage, it is stated <i>“The heritage objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is because the large amount of residential development planned in both rural and urban locations is likely to result in a risk of harm to designated or non-designated heritage assets. Strategic Objective 6 (Environment) addresses heritage issues directly by offering ‘protection to value heritage’”</i></p> <p>The heritage effects on Capel Parish will be wholly negative – pattern of low weald farmsteads and the damage to the setting of listed buildings cannot be replaced.</p>
Chapter 10: Conclusion Table 74 – Housing p.140	<p>Under Housing, it is stated</p> <p><i>“The Housing objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan (Table 8). This is because the large amount of residential development planned is fundamental to the Draft Local Plan.”</i></p> <p><i>“The impact of STR 1 (Spatial Development Strategy) on the housing objective can be seen in Table 14. A highly positive score is recorded to reflect the reasons given above.”</i></p> <p><i>“As would be expected, across the parishes and sites, the most positive effects on the Housing objective are assigned to the sites that would deliver the highest numbers of housing. For this reason, policies AL/CA 1 and AL/CA 3 (aka AL/PW 1) are extremely beneficial to the borough. Highly positive effects are recorded in many rural settlements too for example Horsmonden, Hawkhurst and Cranbrook.</i></p> <p><i>No negative effects are expected from the site allocation policies. “</i></p> <p>It is not clear how this will benefit the residents of Capel or of Tunbridge Wells. It will result in the building of houses attractive to the London market which will put more pressure on existing infrastructure.</p>
Chapter 10: Conclusion Table 74	Under Landscape, it is stated “As for the cumulative impact from release of Green Belt sites, the cumulative

<p>– Landscape p.142</p>	<p>impact on the Landscape objective of all allocated sites (equivalent to STR 1) is expected to be highly negative”</p> <p>TWBC is urged to remove Green Belt development and refocus the plan in line with its environmental objectives. The commentary moves from highly negative to negative by the conclusion; the mitigation ‘to some extent’ is an assertion that has not been evidenced.</p>
<p>Appendix A - Decision-aiding questions used for scoring SA objectives Table 76 p.153</p>	<p>Appendix A demonstrates that no consideration whatsoever has been given to biodiversity and the natural environment outside of designated sites. With regard to landscape no weighting has been given and the comment suggested that there has been some judgement yet there has been nothing to base that judgement given that there has been no comprehensive Borough wide landscape assessment.</p>
<p>Appendix G – Capel Scores for Reasonable Sites p.177.179</p>	<p>The reason given for the rejection of most smaller sites in Capel parish refers to their contribution to the Green Belt, the setting of Five Oak Green, and contribution to the landscape. These are the very reasons that have been ignored in the adjoining strategic sites. In particular the plan refers to the ‘weak’ contribution to the MGB part of AL / CA 3 makes – but it adjoins some of these sites, and its contribution is crucial as explained above.</p> <p>Appendix G suffers from the faults previously identified; in particular in relation to biodiversity and landscape.</p>
<p>Appendix O – Horsmonden Scores for Reasonable Sites p.204-206</p>	<p>Horsmonden makes no reference to site 144 considered as strategic.</p>
<p>Conclusion</p>	<p>Given the above Capel Parish Council believes the overall SA is based on incomplete information and is therefore unsound. It fails to justify the extensive building within the Green Belt envisaged by the dLP, which Capel Parish Council maintains is unsustainable.</p>

End of Response