



## CGPS Response to the Examiner's MIQ (Stage 2)

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### HEARING STATEMENT – MATTER 6 – STRATEGIC SITES

#### **Matter 6 – Strategic Sites (Policies STR/SS1, STR/SS2, STR/SS3, STR/PW1 and STR/CA1)**

##### *Issue 1 – Tudeley Village*

##### Size, Scale and Location of Development

- Q1. What is the site area based on and how was the size of the allocation and number of new homes established? For Tudeley, this was purely based on the proposal from Hadlow Estates who have done the minimum of detailed planning for the Tudeley site.
- Q2. What alternatives to the size and scale of development proposed in the Plan has the Council considered? The Council appear to have accepted the Hadlow Estates outline plans wholesale, though any discussion there might have been was withheld from the local community.

##### Green Belt

- Q4. The *Green Belt Study Stage 2* report concluded that releasing land from the Green Belt between Tonbridge and Paddock Wood (Ref BA4) would cause a 'very high' level of harm to the Green Belt. In the Stage 3 Assessment, a harm rating of 'High' is given for Tudeley Village. What are the reasons for the different scores? As nothing has changed on the ground, this can only be to facilitate the allocation of this land for development. It cannot be due to defining smaller blocks of land as the Tudeley site is of greater value to meeting the NPPF objects than other Green Belt in the Borough.
- Q5. What would be the extent of the harm to the Green Belt if the boundaries were changed in this location as proposed? Are there any ways in which this harm could be minimised or mitigated?

The extent of harm would be Very High as detailed in the Stage 2 report. The original published version of the Stage 3 report still said (in the Summary) that "The findings of the assessment of harm are summarised in Table 4.1 in Chapter 4 and depending on location, range from low harm associated with the release of land around Speldhurst and Pembury, to VERY HIGH HARM at Tudeley Village and Paddock Wood." Clearly the process of changing the conclusions of the report were not very thorough and made to suit the objectives of TWBC based on illogical, incomplete, considerations.

The primary change in the assessment is the very dubious argument that the contribution the sites make to Purpose 2 (preventing neighbouring towns from merging) is relatively weak which is not true. In fact, if you drive from the limits of Tonbridge to the limits of Paddock



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Wood now, the distance is 5.3 miles, of which 0.9 miles is through the village of Five Oak Green, so there is around 4.4 miles of rural separation. If these developments go ahead, there will be only 1.2 miles of rural separation between Tonbridge and Tudeley village and no other gaps in built-up area except 0.3 miles between Tudeley Village and Five Oak Green, which includes the Primary School and the proposed site for the Secondary School, and 0.4 miles between the FOG church and the Dampiers Roundabout.

Even the larger gap between Tonbridge and Tudeley Village will only be the size of an urban park – in fact much less than the length of Hyde Park in London – hardly a Green Belt separation!

If this isn't creating an area of development that contributes strongly to the merging of neighbouring towns, it is difficult to see what would.

Since the Stage 3 report recognises that these areas make a **STRONG** contribution to Purpose 3 (safeguarding the countryside from encroachment), and we would argue that it also makes a **STRONG** contribution to preventing the merging of Tonbridge, Five Oak Green and Paddock Wood, the overall assessment should be of **VERY HIGH** harm to the Green Belt. But even if it is only **HIGH** harm, that should question the choice of these locations over others available in the Borough many of which are outside both Green Belt and AONB.

- Q6. Where it has been concluded that it is necessary to release Green Belt land for development, paragraph 142 of the Framework states that Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. How will this be achieved?

In the Green Belt Study, TWBC do very little to offset the loss of Green Belt. No replacement Green Belt is proposed at all. Some cosmetic mitigations are proposed such as open space within the developments, some locally characteristic planting, hedgerows, and some set-back from roads. They suggest avoiding high density housing on the rising ground to the South of SS3 because of the proximity to the AONB. But nothing that will negate the overall effect of plonking a new town on these fields.

- Q7. When defining Green Belt boundaries, paragraph 143 of the Framework states that plans should, amongst other things, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. How does the Plan meet this requirement for Tudeley Village?

The Southern boundary is defined by the limits of the AONB, the Western boundary by the Hartlake Road, the Eastern Boundary by the boundary of Hadlow Estates ownership and by the need to maintain a token separation between the site and Five Oak Green (likely to be used for a secondary



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school). The Northern boundary appears to be determined by the border of the Parish and the boundary on the EA flood maps between Flood Zones 1 and 2. Local people recognise (if the EA do not) that this is a notional boundary set some time ago and that flooding has been increasingly extensive South of this boundary.

- Q8. Taking into account the answers provided under Matter 4, do the exceptional circumstances exist at site specific level to justify amending the Green Belt boundary in this location?

Certainly not.

### Mix of Uses and Infrastructure Requirements

- Q9. Is it clear to users of the Plan what is meant by the 'provision of employment space' and 'community and leisure facilities'? What is expected of applications for planning permission?

The local community does not have sufficient information to comment on this.

- Q11. How will the phasing of development be controlled and is it clear to users of the Plan what new infrastructure will come forward and when? Is it necessary for such information to be contained in the Plan?

No information appears to be available. The infrastructure for Tudeley Garden Village (roads, access etc.) is to be designed by David Locke Associates. The Tudeley Garden Village is to be designed by an architect from Florida, USA. No information on the interface of infrastructures has been provided for review.

### Viability and Deliverability

- Q20. Is it clear to decision-makers, developers and local communities what infrastructure will be delivered, by whom and when?

Apart from the proposal for minor road improvements and the FOG by-pass no information is available on other infrastructure such as flood avoidance.

### Landscape and Heritage

- Q24. How will the allocation ensure visual and physical separation between Tudeley Village and Five Oak Green? No apparent specific steps.
- Q25. What potential impacts will the proposed allocation have on the significance of designated heritage assets, having particular regard to the Grade I listed Church of All Saints' and Grade II listed buildings at Bank Farm and Lilley Farm? How have heritage assets been taken into account in the preparation of the Plan?



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The proposals will have a detrimental effect on both the setting of All Saints and on the views from the church over the Medway Valley. This in turn will have an adverse effect on its popularity as a visitor attraction. All the existing isolated homes within the site will be surrounded by modern housing with minimal buffer areas around them to protect their tranquillity and of course their market value. The character and heritage of the area will change irrevocably.

### Other Material Planning Considerations

- Q26. Does any of the proposed allocation fall within areas at risk of flooding, taking into account all sources of flood risk and climate change?

The epicentre of the intended Tudeley Garden Village floods every year (Sherenden Road). In 2021 the road was turned into a small river from water washed off the fields. A local swimmer was photographed swimming along the Hartlake Road adjacent to the site.

The Tudeley Solar Farm was stated as never flooding at that planning stage. However Local Knowledge has consistently photographed the flooded Solar Farm in every winter since it was built.

Any intended wastewater and sewage treatment developments would need to be on lower lying land in the flood plain (or pumped up hill to the nearest treatment station in Tonbridge to avoid flooding)

- Q27. Map 32 of the submission version Local Plan shows a 'potential train station site' within the allocation. What is the latest position regarding the potential for a new station at Tudeley Village? Is it a requirement of the allocation?

Network Rail have stated in writing that there is no possibility of a station at Tudeley not just because of the huge cost but mainly because of the proximity to Tonbridge and Paddock Wood, the increase in journey times and the adverse impact on the scheduling of services.

### *Issue 3 – Paddock Wood and East Capel*

#### Size, Scale and Location of Development

- Q1. What is the justification for having a single policy (Policy STR/SS1) for the different development parcels at Paddock Wood and East Capel? Is it necessary to have development requirements for each specific area?

These are separate Parishes with very different characteristics. TWBC have had discussions with PWTC about the design for East Capel without involving CPC.

- Q3. Is it clear to developers, decision-makers and local communities what scale and mix of uses are proposed on each parcel (including the amount of employment land)?



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The key point is that TWBC insist on locating the Sports Hub on the very edge of the expanded town of Paddock Wood against the wishes of the local communities (Capel and Paddock Wood). This means that PW residents on the East of the town will have a long way to travel to the Sports Hub and are likely to use cars.

### Green Belt

- Q4. In the *Green Belt Study Stage 1*, how was parcel PW1 defined? Was land to the west of Paddock Wood, up to the A228 considered at this stage?

We do not believe that the Stage 1 study considered specific development sites, just parcels of GB land.

- Q5. In the *Green Belt Study Stage 3*, Map 2 identifies that releasing land to the west of Paddock Wood will cause 'moderate' harm nearest the existing settlement, with 'high' levels of harm on roughly the western half of the parcel nearest the A228. What are the reasons for this and how have the findings been taken into account in the preparation of the Plan?

We assume it is based on the proximity of the Eastern half to PW, i.e. that easing PW out a bit might be acceptable. But the whole site should be considered as a whole, and High Harm would be the result.

- Q6. Where it has been concluded that it is necessary to release Green Belt land for development, paragraph 142 of the Framework states that Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. How will this be achieved?

No meaningful compensatory arrangement are specified.

- Q7. Taking into account the answers provided under Matter 4, do the exceptional circumstances exist at site specific level to justify amending the Green Belt boundary in this location?

Absolutely not. The harm caused by both the strategic sites in terms of the coalescence of Tonbridge, Five Oak Green and Paddock Wood is very high. It will be possible for someone to drive ten miles from the North of Tonbridge, through the town and the Parish of Capel and through Paddock Wood without passing through anything resembling open countryside. Tonbridge, Five Oak Green and Paddock Wood, which are currently separate and very different communities, will merge into one defeating the purposes of the Green Belt. Other local villages such as Whetsted will be absorbed.

### Landscape and Heritage

- Q21. What potential impacts will the proposed allocation have on the significance of designated heritage assets, having particular regard to the Grade II



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listed buildings at Badsell Manor Farmhouse, Mascalls Court, Mascalls Court Lane and Knell's Farm? How have heritage assets been taken into account in the preparation of the Plan?

A much larger buffer zone should be allowed around these historic buildings.