



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

HEARING STATEMENT – MATTER 3 – SPATIAL STRATEGY

Issue 1 – Spatial Strategy

- Q5. The Development Strategy also supports the "...creation of a new garden settlement: Tudeley Village...". What were the reasons for pursuing a new, standalone settlement, rather than the expansion of existing towns and villages? Is this justified?

The inclusion of a settlement at Tudeley came as a shock to local residents. The concept was not even considered in the Issues and Options Report (2017) at which stage the whole idea of garden settlements was unpopular with those consulted. Of the options presented in the consultation only 18% preferred "New Freestanding Settlements", whereas 60% preferred the "Growth Corridor-led Approach".

The Tudeley site was not included in the original Call for Sites in 2016. It is clear that the Council changed tack as a result of an approach, and then extensive lobbying, from Hadlow Estates offering extensive land at Tudeley for development. The idea of a large settlement on land from one landowner who was prepared to undertake the Master-planning was too attractive for the Council to resist and they re-opened the call for sites in response.

There followed a period during which Capel Parish Council were informed of the new proposals but under a Non-Disclosure Agreement, which meant that for another year residents had no idea of the impending threat. It was therefore a shock when the Local Plan was published in 2019 and included a major new town built over the small village of Tudeley when Capel was also expected to bear a second major development in the East of the Parish which was part of a major expansion of Paddock Wood.

The importance of the Green Belt, on which both settlements would be built, was underplayed and options to expand Paddock Wood further to the East, away from the Green Belt, were not pursued.

TWBC had, in its Green Belt Study Stage 2, found that the respective areas of Green Belt in Capel Parish would represent "Very High Harm" if released, which of course was a severe problem to them if they wanted to develop these two areas. They therefore undertook a Stage 3 Study, which downgraded the finding to "High Harm" in the body of the report by breaking the areas down into smaller blocks, as if these were the least sensitive parts of the area, which is clearly not the case. Carelessly they forgot to change the Summary to the report which still indicated "Very High Harm". They subsequently had to amend this report (in an undated amendment) to correct this mistake.



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A review of the SHELAA (2021) shows that 518 sites were submitted to the Council. It also shows that a number of sites (307, 308) were considered unsuitable for allocation because of concerns about the erosion of the gap between Five Oak Green and Paddock Wood and the gap between Paddock Wood and Tudeley, yet the two largest sites were considered suitable despite the risk of these settlements coalescing. Also many smaller sites were ruled out because of moderate or high harm to the Green Belt.

Capel Parish alone had many more alternative sites for TWBC to consider. However most of these were rejected for the very reasons that were ignored when selecting the Tudeley Garden Village site (option 2). The details of these are explained in Appendix 1. 47 sites in Capel were submitted to the SHELAA process, of which 9 were accepted into the Local Plan. But it is notable that many of the 38 sites were rejected for reasons which apply at least as much to the Tudeley site, the coalescence between Five Oak Green and Pembury and between Five Oak Green and Tonbridge (e.g. sites 306,307,308,329), the encroachment into the countryside (site 48), and impact on heritage assets (sites 216, 329). It is remarkable that it seems acceptable to build a large development in this area when it is not acceptable to build on smaller sites because of their impact on the Green Belt.

If it is essential to build on Green Belt land, it might be more sensible to take some of the sites around Five Oak Green, expanding the LBD of the village rather than building a separate settlement.

Looking more widely, four sites were rejected in and around Horsmonden which would yield almost 2000 dwellings. The reasons sound familiar – sited in a rural location, landscape and heritage concerns, impact on long range views, impact on nearby AONB, good agricultural land, lack of local services, lack of public travel options. All of which apply in Capel. But here used to reject the potential of almost 2000 homes which could be built outside both Green Belt and AONB. And there are plenty of others.

HORSMONDEN SITES

Ref	Yield	Decision	Description	Reasons
144	622-1243	Rejected	Commercial and agricultural. Adjacent to Maidstone Rd and Yew Tree Rd, where local borough councillor lives. Starts at N end of Horsmonden.	Very large allocation disproportionate to the size of Horsmonden, with concern about landscape and heritage. Built development especially in those areas with long range views out of the site would have a detrimental impact upon the setting of the AONB (which is about half a mile to the West). Not in GB or AONB.



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169	144	Rejected	Agricultural, no buildings. Adjacent to Maidstone Rd and Yew Tree Rd, where a local borough councillor lives. 1¼ miles from Horsmonden	Sited in a rural location. Lack of safe pedestrian access to facilities in Horsmonden. NB: Not in GB or AONB.
377	176	Rejected	Agricultural, no buildings. Close to village centre.	Lack of a pavement from site to Horsmonden. Lack of key services, lack of public travel options. Contains grade 2 and grade 3 agricultural land. Loss of a greenfield site adjacent to AONB in a historic landscape. Not in GB, adjacent to AONB.
378	290	Rejected	Agricultural, no buildings. Close to village centre.	Concerns regarding the landscape sensitivity of this site including its impact on a historic farmstead. Concern over means of access. Contains grade 2 and grade 3 agricultural land. Lack of key services, lack of public travel options.

Elsewhere, many sites were offered in places like Frittenden and Speldhurst but almost entirely rejected because of rural settings. Only one small site was accepted in each of these Parishes – less than 100 homes in total (see Appendix 2 for details).

It is clear that accepting the offer of the Tudeley site has provided TWBC with a much easier delivery task, dealing with a single landowner, than the preferable option of concentrating on Brownfield, urban areas and non-Green Belt options. We are concerned that that single landowner has chosen to be his own developer despite no experience in this form of development – planning building or infrastructure. Hadlow Estates has failed to engage with the community in a meaningful manner. They rarely attended the Strategic Site Working Group giving minimal updates. And those from the Parish Council who did attend had to sign a NDA.

Local residents have pointed out that the Government states that the OAN is a policy, not a target, and that LPAs need to balance the need for housing with the importance of the Greenbelt. On 25 June 2019, while TWBC were carrying out Reg 18 consultation, Boris Johnson stated “We should not be imposing targets on councils that [they] are simply finding impossible to meet without building on the Green Belt, so we have to be much more sensitive in what we are doing”. TWBC have hurried through their submission to avoid any new rulings from HMG regarding enhanced Green Belt protection.



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- Q8. Could housing needs be met in a way that did not require land to be removed from the Green Belt and/or require development in the AONB?

There are numerous other sites for development in Tunbridge Wells, including many Brownfield Sites, but these are unattractive to the Council due to the multiple landowners, and to Developers due to the cost of adapting the sites for residential use.

- Q9. Do policies relating to the Green Belt, the High Weald AONB and/or flood risk provide a strong reason for restricting the scale, type and distribution of development in Tunbridge Wells?

The sites in Capel are detrimental to the Green Belt and the High Weald AONB and are increasingly prone to serious flooding from surface water and tributaries of the Medway. We believe that the weight of arguments against development do provide a reason for restricting development in Tunbridge Wells.

Issue 4 – Management of Development in the Green Belt

- Q1. It is sufficiently clear to decision-makers, developers and local communities which settlements are 'washed-over' by Green Belt?

We understand that "washed over" is no longer referred to in the NPPF, and we do not believe that local residents have any concept of what it means.

- Q2. Where new development is proposed in the Green Belt, is Policy STR9 justified, effective and consistent with national planning policy?

We believe that there are no 'exceptional circumstances' here to justify release of these sites from the Green Belt. 'Exceptional' must mean out of the ordinary. TWBC argues that the fact of the OAN constitutes an exceptional circumstance. However, this is not unique to Tunbridge Wells but is an issue throughout the MGB, so is not "exceptional". According to the London Green Belt Council 82% of LPAs with Metropolitan Green Belt Land are planning to release some of it – so these circumstances are commonplace, not extraordinary. This conflict in policies (which affects Green Belts across the country) needs to be dealt with by Central Government, by making their policies on housing targets and Green Belt mutually compatible.



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APPENDIX 1: CGPS analysis of Capel SHELAA

Greenbelt Issues - Based on the CGPS RESPONSE TO REG 19

CAPEL SITE SELECTION CONTRADICTIONS

In the Parish of Capel alone TWBC had 47 alternative sites offered to them, following their Call for Sites, to select housing allocations for their Draft Local Plan (now submitted).

Let alone other alternative sites to choose from in the rest of the large Borough. We refer to:

Tunbridge Wells Borough Council (January 2021) *Strategic Housing and Economic Land Availability Assessment for the Pre-Submission Local Plan*. Available at https://tunbridgewells.gov.uk/data/assets/pdf_file/0010/388054/001_SHELAA_Main-Report.pdf

Tunbridge Wells Borough Council (January 2021) *Site Assessment Sheets for Capel Parish, Strategic Housing and Economic Land Availability Assessment for Pre-Submission Local Plan*. Available at https://tunbridgewells.gov.uk/data/assets/pdf_file/0006/388059/04_Capel-Site-Assessment-Sheets_SHELAA.pdf

Capel Options

	SHEELA	Jan-21	
All Sites		47	
Sites Accepted		9	19%
Total ha identified		1,627	
ha accepted		601.8	37%
Total yield identified		20,428	
Total yield accepted		6412	31%

Nine sites were accepted – including the Tudeley Garden Village site (option 2). 38 sites rejected. 31% of the total housing yield was subsequently selected in this SHELAA to which the TWBC added more requirements at a later date. Focusing 44% of the TWBC housing requirements, identified and accepted in this SHELAA, in one small parish (Capel) site - Tudeley.

Instead of a fair distribution of intended housing sites across the whole borough. Focusing on Brown Field Sites, Urban areas and non-Green Belt locations.

There are no NPPF stated “Exceptional Circumstances” identified anywhere in the submitted TWBC Draft Local Plan – especially as so many alternative sites were available to TWBC.

The selection of one site (Tudeley Option 2 – as a Strategic Option) enabled TWBC to **more easily** deal with one landowner for 2,800 dwellings – with TWBC abdicating the design and infrastructure responsibilities of this site to this one landowner:

1. who does not have comparable development, building or infrastructure experience.



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2. who has not engaged with the community at a satisfactory level (mere box-ticking minimum publications of very draft maps).
3. involvement at the TWBC Strategic Site Working Group’s meetings (which CGPS attended as a CPC Neighbourhood Plan representative) was also at a minimum level by this landowner’s representatives. Very few, occasional, attendances by HE occurred at which the provision of minimal updates only, were offered at these meetings. And held under a NDA.

Alternative Sites – and the selection of Tudeley Garden Village site

Tudeley Site

There are three alternative options in the selection of sites at Tudeley. Two of these options were rejected due to unsuitability of Green Belt release harm

Option 1 (rejected)

Site	Site #	ha	residential yield	GB release harm
Tudeley option 1	446 448	77.48	1500	moderate to high
				This site is not considered suitable as a potential Local Plan allocation

Option 3 (rejected)

Site	Site #	ha	residential yield	GB release harm
Tudeley option 3	446 178 183 308 418 440 446 448 452 453	299.32	5000	moderate to high
				For the reasons set out, the site is considered unsuitable as a potential Local Plan allocation.

Option 2 (selected)

This is the option selected based on it being a “Strategic” Option



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Site	Site #	ha	residential yield	GB release harm
Tudeley Option 2	448	170	2800	The land is Green Belt, and the Green Belt Study Stage Three Assessment prepared by LUC for the Council (2020) identifies the harm resulting from the removal of this land from the Green Belt is high (moderate to high in the southwestern part of the site)

By declaring the option selected as a Strategic Site the classification of Green Belt harm was downgraded by way of justification. Contradicting the findings for Green Belt harm in options 1 and 3.

Green Belt Sacrifice

The SHELAA states that, with option 2, “There is also scope for compensatory improvements to the Green Belt.” But there are no compensatory Green Belt allocations in the submitted Local Plan.

Inaccurate Maps in the SHELAA

The maps in the Shelaar document for this option are inaccurate as not all Freehold property is identified.

Reasons other Sites Rejected

Many other sites were rejected for the reasons Option 1 and 3 were rejected. But which for the selection of Option 2 were ignored as it was selected.

1. Green Belt Harm
2. Urban Coalescence
3. Heritage
4. Size
5. Remoteness

Items 1, 2 and 3 all apply strongly to the Tudeley Garden Village options. Examples of Reasons for Rejections are quoted from the SHELAA below:

Rejections for Green Belt Harm and subsequent Urban Coalescence

Site Reference: 307 Site Address: Land to the north of Badsell Road, Five Oak Green, Kent

Unsuitable because there is a landscape concern that this site would erode the green gap between Five Oak Green and Paddock Wood if this land is removed from the Green Belt. **This is a significant chunk of a Green Belt parcel the release of which would cause moderate harm.**

Site Reference: 317 (Local Plan Allocation STR/SS 1 (site is part of larger allocation) Site Address: Tudeley Brook Farm, Whetsted Road, Paddock Wood, Kent

It is recognised that the site is Green Belt. There is national policy protection for the Green Belt, but the NPPF also recognises that Green Belt boundaries can be altered where there are exceptional



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circumstances, and these are fully evidenced and justified. **The Green Belt Study Stage Three Assessment (2020) identifies that the release of the land from the Green Belt in this location will cause moderate to high levels of harm**

Site Reference: 308 Site Address: Land to the west of Maidstone Road, Five Oak Green, Kent

Unsuitable because there is concern that allocation of this site would result in coalescence concerns between Capel and Paddock Wood; it is also part of a larger Green Belt parcel the release of which would cause very high harm

Site Reference: 329 Site Address: School field, Finches Farm, Five Oak Green, Tonbridge, Kent

The site is considered unsuitable for allocation. **There are concerns about the coalescence between Five Oak Green and Tudeley** if this land is released from the Green Belt in light of the planned development at Tudeley Village. There are also some heritage and landscape concerns with this site. It lies adjacent to historic farmsteads and forms part of the landscape setting of the settlement

CGPS Note: Coalescence between Tonbridge and Five Oak Green are ignored or not acknowledged

Site Reference: 216 Site Address: Land at Moat Farm, Whetsted Road, Five Oak Green

Unsuitable for allocation. There are concerns about the ability to provide an appropriate means of access to the site. There are also heritage and landscape concerns, the site being in proximity to historic farmsteads and forming part of the landscape setting of the settlement; and **the release of land from the Green Belt which makes a very high contribution to the Green Belt in this location.**

Site Reference: 306 Site Address: Land at Colts Hill, Paddock Wood, Kent

There is also concern about **coalescence between Five Oak Green and Paddock Wood** if this land is removed from the Green Belt.

CGPS Note: Coalescence of Tonbridge and Five Oak Green is not considered however for the selection of Tudeley Garden Village (Options 1,2,and 3)

Site Reference: 11 Site Address: Land at and to the rear of 50 Whetsted Road, Five Oak Green, TN12 6RT

The site is considered unsuitable because of **harm that would be caused to the Green Belt**, if the site were to be released from it (very high impact).

Site Reference: 48 Site Address: Bramley House, Five Oak Green Road, Five Oak Green, Capel, TN12 6TJ

Unsuitable because there are landscape concerns associated with this site. **The site is Green Belt and the parcel would cause moderate harm if released.** The rear part of the site is an encroachment into the countryside beyond which would be logical. The northern part of the site also has flooding concerns

Site Reference: 143 Site Address: Land at Tolhurst Road, Five Oak Green

Moderate harm would be caused by the removal of land from the Green Belt in this location, but if exceptional circumstances can be demonstrated the site could provide a suitable opportunity for allocation



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Whilst there are landscape issues to address the site could offer a suitable and logical extension to the existing residential development to the west of the site. However, it is not included as an allocation given the Development Strategy for the borough in meeting the Local Housing Need which directs significant housing growth to new settlements at Tudeley Village and Paddock Wood.

Rejections for being too small

Site Reference: 156 Site Address: Bracken Dale, Maidstone Road, Colts Hill, Capel, TN2 4AL

Unsuitable. The yield is fewer than 10 units which is considered unsuitable for site allocation. Further the site is located away from an existing settlement, with limited access to key services and facilities. It is not considered sustainable in this regard

Rejections for being remote

Site Reference: 178 Site Address: Land on the west side of Hartlake Road opposite The Poacher Public House and on the east side of Hartlake Road, Tudeley, Capel

The site is remote from a settlement centre, and unlikely to be sustainable in this context.

Rejections for Heritage Issues

Site Reference: 183 Site Address: Tanners Farm, Church Lane, Capel

The site is remote from the settlement, and is considered, due to the heritage issues, any likely yield on this site is likely of a scale that is not considered suitable for allocation.



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CAPEL PARISH SHELA ANALYSIS

Totals			ha	residential yield	
			1,627	20,428	
Accepted	Site	Site #	ha	residential yield	GB release harm
	Tudeley option 3	446 178 183 308 418 440 446 448 452 453	299.32	5000	moderate to high For the reasons set out, the site is considered unsuitable as a potential Local Plan allocation.
Yes	Paddock Wood		360.58	3600	potential to high
Yes	Maidstone Road	309	9.18		
Yes	Whetsted Farm	310	10.39		
Yes	Sebastopol	311	11.42		
Yes	Whetsted Wood	312	7.85		
Yes	Whetsted Road	314	15.23		
Yes	Whetsted Road	317	5.3		
	Tudeley Brook Farm	DPC19	1.95		
	Longfield Road	DPC7	117.82		
Yes	Tudeley Option 2	448	170	2800	The land is Green Belt, and the Green Belt Study Stage Three Assessment prepared by LUC for the Council (2020) identifies the harm resulting from the removal of this land from the Green Belt is high (moderate to high in the southwestern part of the site)
	Tudeley option 1	446 448	77.48	1500	moderate to high This site is not considered suitable as a potential Local Plan allocation
	Capel Grange Farm	426	36.3	1084	
			35.52	976	
			53.95	829	
	North Farm Industrial Estate	43	21.48	423	
	Alders Wood	447	20.47	353	
	Capel Grange Farm	426	36.3	542	
	Forest Farm	77	16.95	508	
	Castle Hill Farm	49	35.52	488	
	Apple Tree & Devils Wood	62	53.95	415	
Yes	Postern	454	11.85	117	
	Finches Farm	329	7.31	219	
	Five Oak Green	450	6.67	200	
	Sychem Lane	29	6.23	181	
	Maidstone Road	308	5.8	174	
	Five Oak Green	451	5.09	153	
	Colts Hill	306	5.03	151	
	Badsell Road	307	3.79	114	
	Forstal Field	331	2.95	88	
	Hartlake Road	178	2.91	87	
	FoG Road	12	2.1	60	
	50 Whetstead Road	11	1.62	49	
	Capel Grange Farm	418	1.45	44	
	Old Vicarage	440	1.42	37	
	Tudeley Road	452	1.2	36	
	Moat Farm	216	1.06	32	
	Potters Wood	449	0.82	25	
	Bramley House	48	0.75	21	
	Tolhurst Road	143	0.7	21	
	Hartlake Road	453	0.7	21	
	Orchard Brook	10	0.77	20	
	Badsell Road	141	0.33	10	
	Bracken Dale	156	0.64	10	
	Tanners Farm	183	1.31	10	
	Sychem Lane	254	0.56	10	
	Finches Farm	330	1.38	10	
	Capel range Lodge	387	0.37	10	
	Castle Hill	49 62 DPC7	109.67		
	Badsell Road	142	45.33		



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APPENDIX 2: CGPS analysis of SHELAA for other Parishes

DISPROPORTIONATE ALLOCATIONS

Capel Parish is to have its dwellings increased by 547% as TWBC seek to put all Capel allocations onto one Landowners very large site at Tudeley and the rest in East Capel. This is 8% of all TWBC’s dwelling allocations.

There is no fair distribution of allocations across the borough – based on contradictory evaluations that enable rejection of so many alternative sites.

Sites rejected to enable TWBC to deal with fewer landowners.

CONTRADICTIONARY EVALUATIONS OF SITES

TWBC have been offered 518 sites to allocate housing dwellings. The vast majority have been rejected for reasons, reasons which were ignored or downgraded when selecting the Capel Tudeley Garden Village and East Capel sites:

Source: **Tunbridge Wells Borough Council Strategic Housing and Economic Land Availability Assessment SHELAA for the Pre-Submission Local Plan January 2021**

“1.11 The total number of sites included in this final report (which takes account of the fact that some sites submitted have superseded previous ones, and a small number of sites have been withdrawn by their site promoters) is some 518 sites”

(A) Parish	(B) Dwelling Stock (as at 05 August 2020)	(C) Upper Allocation Capacity (excluding sites with planning permission in Column D)	(D) Number of Dwellings with Extant Planning Consent (as at 01 April 2020; this figure may include allocated sites in Column C)	(E) Indicative Distribution of Windfall Development as a Share of Local Plan Indicative Windfall Allowance	(F) Total Dwellings Expected within Plan Period 2020-2037 (Columns C+D+E)	new community size	increase in dwellings %	% of TWBC Total
Capel	951	4198	27	24	4249	5200	547%	8%
Paddock Wood	3473	4000	990	72	4825	8298	239%	13%
Hawkhurst	2276	489	146	106	741	3017	133%	5%
Horsmonden	986	205	31	50	286	1272	129%	2%
Cranbrook and Sissinghurst	2903	307	306	103	716	3619	125%	5%
Benenden	885	95	51	28	174	1059	120%	2%
Brenchley and Matfield	1207	87	63	56	206	1413	117%	2%
Pembury	2487	245	119	27	391	2878	116%	4%
Frittenden	372	30	18	10	58	430	116%	1%
Royal Tunbridge Wells	22642	1186	1342	750	3278	25920	114%	39%
Sandhurst	613	30	20	15	65	678	111%	1%
Lamberhurst	692	30	5	27	62	754	109%	1%
Southborough	5121	26	153	155	334	5455	107%	8%
Bidborough	424	0	10	16	26	450	106%	1%
Goudhurst	1286	0	39	35	74	1360	106%	2%
Speldhurst	1976	12	22	50	84	2060	104%	3%
Rusthall	2205	15	20	44	79	2284	104%	3%
Total	50499	10955	3362	1568	15648	66147	131%	100%

Examples of reasons for rejections of locations both not in the Green Belt, and in the Green Belt, include:



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1 Within the Green Belt

Tunbridge Wells Borough Council Site Assessment Sheets for Speldhurst Parish Strategic Housing and Economic Land Availability Assessment – Regulation 19 Consultation January 2021

Site Reference: Late site 15

Site Address: Herons Oast Farm, Speldhurst Road, Langton

This was rejected as being on the Green Belt and causing “very high harm” – a classification of the Tudeley Green Belt that was downgraded to be able to include it in a Strategic Site allocation.

2 Not in the Green Belt

Tunbridge Wells Borough Council Site Assessment Sheets for Frittenden Parish Strategic Housing and Economic Land Availability Assessment for Pre-Submission Local Plan January 2021

Site Reference: 349 Site Address: Pound Hill Field, Biddenden Road, Frittenden, Kent

This site offers the potential for 46 dwellings – but has been rejected due to it being “harmful to the landscape”.

This is not Green Belt.

Site Reference: DPC16 Site Address: Land North of Hollenden, Frittenden

This site was rejected as it is in “a rural setting”

Capel is a rural setting

Site Reference: Late site 39 Site Address: Dragonfly Farm, Langton Road, Speldhurst

This site was rejected due to Limits to Build considerations – which could strategically be changed

Five Oak Green has Limits to Build boundaries and development of Five Oak Green have been entirely left out of the Local Plan

Of 3,541 potential dwelling developments in just 2 alternative parishes only 42 dwelling location sites were accepted in these two SHELAAs



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Parish	sites offered for dwellings	Site	capacity - dwellings	decision	Total Dwellings potentially available	reason for rejection	Total accepted fromn the local parish potential sites	% accepted from the total potential available
Frittenden	5		56	rejected		too remote		
			10	rejected		too small		
		349	46	rejected		harmful to the landscape		
			30	accepted			12%	0.9%
		DPC16	101	rejected	243	rural setting		
Speldhurst	22		10	rejected		rural setting		
			67	rejected		Green Belt		
			30	rejected		Green Belt		
			24	rejected		remote		
			98	rejected		Green Belt		
			10	rejected		remote		
			44	rejected				
			12	accepted			0.4%	0.3%
			10	rejected				
			10	rejected				
			12	rejected				
			10	rejected				
			46	rejected				
			789	rejected		Green Belt AONB		
			53	rejected				
		39	26	rejected		LtB		
			135	rejected				
			699	rejected		Green Belt AONB		
			425	rejected		Green Belt AONB		
			351	rejected				
	34	rejected						
	162	rejected						
	151	rejected			3208			
					3451			

This pattern of reasons for rejection is repeated throughout the other TWBC SHELAAs. It is interesting to note that TWBC justify and build on AONB at North Farm for commercial reasons – but use AONB as a reason for rejection for Housing.