

## **Examination of the Tunbridge Wells Borough Local Plan – Stage 2**

### **Matter 6 Strategic Sites – Issue 3 – Paddock Wood and East Capel**

This statement is submitted on behalf of Mr and Mrs Whetstone for purposes of the Examination of the Tunbridge Wells Borough Local Plan. It responds to Matter 6 (Strategic Sites) Issue 3 – Paddock Wood and East Capel specifically Questions 3, 10, 22 and 23.

#### **Question 3: 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)?**

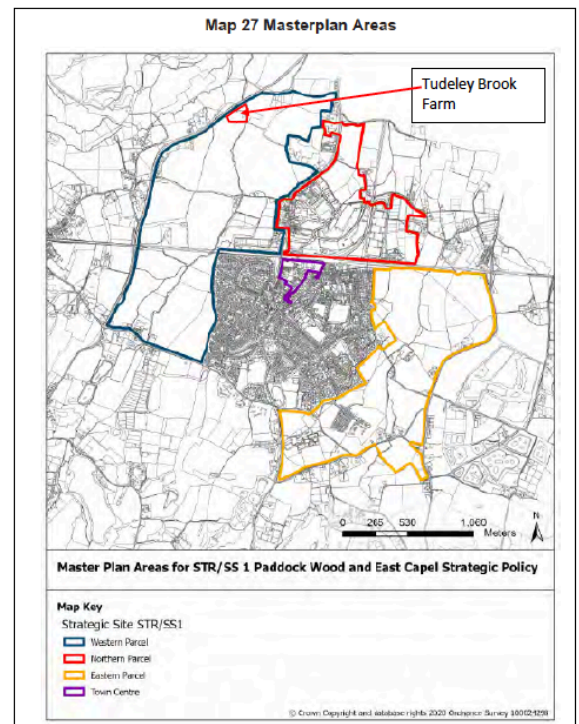
No.

The National Planning Policy Framework (NPPF) establishes at Paragraph 16d) that Plans should “*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*”. As currently drafted Policy STR/SS1 is vague, imprecise and lacks a level of commitment to ensure that sites are brought forward in their entirety. In particular, concerns are raised in relation to Tudeley Brook Farm which forms a legitimate and important part of the integrated masterplan vision. Yet for the reasons set out below we have real concerns it will be marginalised and left to stand in isolation.

The Whetstones live at Tudeley Brook Farm, Whetsted Road, Paddock Wood. It is a private home with several outbuildings and land. It extends to 1.95 hectares. It is located within the Parish of Capel and lies to the north of Paddock Wood, directly south of Whetsted Road (A228). It is included as part of the larger allocation for Paddock Wood - STR/SS 1. The full extent of the holding is identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and referenced ‘Site DPC19’, which is attached at Appendix 1 for ease of reference.

Policy STR/SS1 recognises that there are three distinct parcels around Paddock Wood which form part of the allocation: western, eastern and northern parcels, as shown on Map 27.

Tudeley Brook Farm is located in the western parcel. The principal site promoters of the parcel are Crest Nicholson (Crest) (who control the majority of land to the north of the railway) and Dandara (who control the majority of land to the south of the railway). It is understood that there may be other parties (similar to Tudeley Brook Farm) with control over landholdings within the western parcel but the details are unknown.

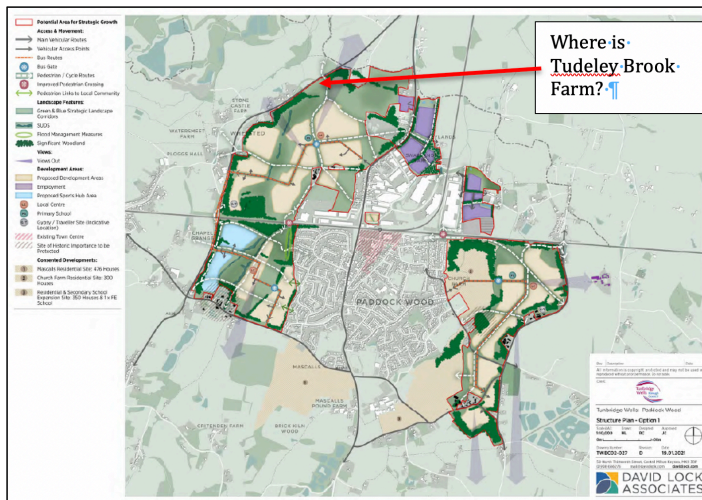


In preparing the Local Plan, a comprehensive masterplan exercise was conducted by independent consultants, David Lock Associates (DLA), meaning that an ownership blind approach to masterplanning was adopted. Adopting this approach ensured that the planned expansion fully maximised the development potential in terms of securing the important garden settlement principles, providing the key infrastructure in the right locations, all without influence or favour on landowning interests. As part of this process a Structure Plan (Map 28) was produced showing broad areas of growth around Paddock Wood and East Capel.

Tudeley Brook Farm is located within a 'Green & Blue Strategic Landscape Corridor' in the Structure Plan. This Green and Blue Strategic Landscape Corridor is a core component in the acceptability of the proposed development. Its act as a facilitator to the wider site allocation by, inter alia, providing a green setting for the thousands of new homes, providing important ecological habitat and acting as an essential element to flood alleviation.

As a side note, it is important to point out there is no acknowledgement of the presence of Tudeley Brook Farm in the Structure Plan (Map 28). A copy of Map 28 is provided below for ease of reference.





It is not clear why Tudeley Brook Farm has been removed entirely from the Structure Plan?. The plan indicates that DLA intended for it to be taken over and restored back into the functional flood plain? In our submission to the regulation 19 version of the Local Plan, we indicated that our clients were happy for Tudeley Brook Farm to be included and used proactively to mitigate flood risk elsewhere.

The purpose of this submission is to raise our grave concerns about the status of Map 28. The map is only directly referenced once in Policy STR/SS1. Instead, reliance is placed upon producing three 'Framework Masterplans'. It is understood that it will be these masterplans, that have yet to be prepared, that will apparently guide development – and not, the Structure Plan (Map 28).

It was incongruous for Tunbridge Wells Borough Council (TWBC) to incur considerable time, effort and expense in instructing independent consultants to undertake a masterplanning exercise when it appears that the Structure Plan may actually hold little status.

A Statement of Common Ground (SOCG) between Crest and TWBC, has been specifically prepared for the purposes of this examination, and a review of this document raises further concerns about the status of Map 28.

Paragraph 2.8 in the SOCG refers to Map 28, stating that: "...this is not a fixed blueprint for development". The SOCG suggests that Map 28 should be a "starting point" but that in reality the



associated infrastructure will be secured by the individual site promoters, through the production of Framework Masterplan SPDs. Flexibility will be incorporated into these masterplans/SPDs. For ease of reference a copy of Paragraph 2.8 from the SOCG is provided below.

2.8 The Structure Plan is referred to in TWLP Policy STR/SS1 (Map 28). However, it is recognised that this is not a fixed blueprint for development. Instead, it establishes critical elements which should be secured through the delivery of the strategic settlement. Policy STR/SS1 has been formulated with this approach as a starting point, as set out in the Strategic Sites Topic Paper (Section 8.0). The policy sets out the quantum of development of housing, approach to housing mix and affordable housing provision. The associated infrastructure as identified through the Infrastructure Framework (see below) is integrated within the Policy so the provision of these is secured. This is done in a manner which sets out the broad locations where these should be provided, but seeks to allow flexibility within the parameters of the masterplans for these to be interpreted by the individual site promoters and development through the production of Framework Masterplan SPDs (see below).

Paragraph 2.16 of the SOCG then confirms that *“It is accepted that planning application will be bought forward by each housebuilder separately”* (i.e Crest and Dandara) and that in this respect, *“it is intended that Crest Nicholson submits a planning application for the land within its control only”*.

It is our assertion that the SOCG raises real concerns about a deliberate attempt to bypass the local plan process. It directly contradicts TWBC’s stated aims of providing a holistic and comprehensive development. We have real concerns that Tudeley Brook Farm will be marginalised and left to stand in isolation if Crest are allowed to secure an application only on the land which they control.

Another example of TWBC appearing to bypass the masterplanning/ownership blind approach is reference to “provisional” Limits to Built Development, with Paragraph 5.195 of the Submission Local Plan (2021) stating that the parcels of land for development are only *“provisional”*, that *“boundaries may alter”* and that these details will actually be considered and agreed at the planning application stage.



This approach brings with it considerable uncertainty for the local community and for landowners like our client and the Limits to Built Development should be fixed now to ensure that the Plan is found sound.

The problem is exacerbated as there are no direct references in the actual wording of Policy STR/SS 1 in the Submission Local Plan (2021) to Tudeley Brook Farm. We raised this point specifically with TWBC as part of our submission to the Regulation 19 version of the Local Plan requesting direct support for Tudeley Brook Farm to facilitate its wider integration within the wider allocation. Regrettably our request has been ignored.

Policy STR/SS1 is contradictory. On the face of it reference is made to 'comprehensive', and 'holistic' development based on masterplanning principles but actually when you "dig deeper" there is no commitment to fixing the site boundaries and to ensuring that all sites identified within the Structure Plan are brought forward in their entirety. The policy reads more as guidance than as a development plan policy and it is unclear on how its provision should be applied.

Notwithstanding many attempts to gain clarity from TWBC at this late stage in the development of the Local Plan our clients are still unclear about:

- a) The future of Tudeley Brook Farm (is it going to be developed for Green and Blue infrastructure?)
- b) The status of the Structure Plan (Map 28);
- c) Why the site boundaries for this strategic allocation are only provisional and have not been fixed.

This is unacceptable. The inherent level of flexibility in Policy STR/SS1 only serves to help the developers. Meanwhile the local community and the smaller landowners are left unclear about the extent and scale of the development and mix of uses proposed on each parcel of land.

**Question 10 – What is the justification for requiring a drainage strategy to be in place prior to the granting of planning permission 'unless exceptional circumstances arise?.'**

It is imperative that a comprehensive drainage strategy is in place and agreed with all affected parties before any planning application is progressed. No exceptions.



One of the main reasons why land around Paddock Wood has been allocated for development is that it will provide opportunity for betterment to the significant flooding and drainage issues faced by the town. We have very real concerns that this betterment will not materialise if planning applications are submitted in a piecemeal approach without a site wide drainage strategy in place.

The purpose of the planning system is to contribute to the achievement of sustainable development, which includes mitigating and adapting to climate change. Chapter 14 of the NPPF is dedicated to meeting the challenge of climate change and flooding. Paragraph 161 notes that all plans should apply a sequential risk based approach to the location of development so as to avoid flood risk to people and property. This should be done by:

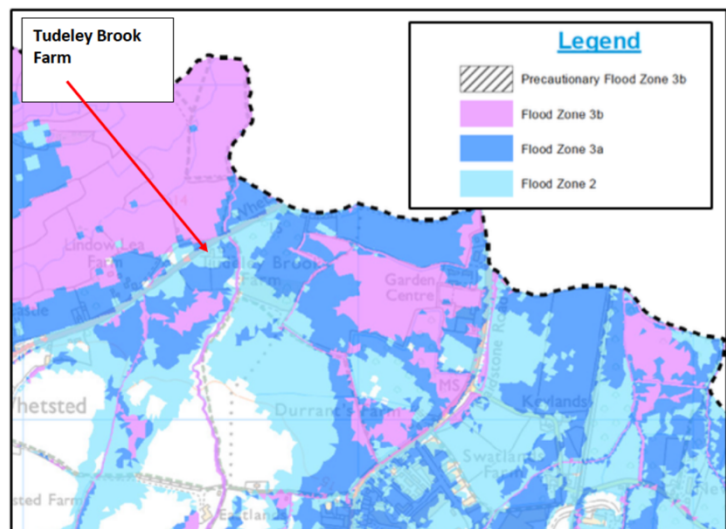
- a) applying the sequential test and then, if necessary, the exception test;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impact of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
- d) seeking opportunities to relocate development where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term.

Paragraph 167 makes it clear that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere.





By way of background, the majority of Tudeley Brook Farm is currently located in Flood Zone 2, whilst the land surrounding it is in Flood Zone 3a. The map showing the flood zone of the site, taken from the Strategic Flood Risk Assessment (SFRA), is provided alongside for reference.



The brook running alongside the house is the main drainage route out to the Medway and as such the site already suffers from leeching from this brook during period of high water.

In order to protect their home from this, our clients have funded their own flood defence strategy at a very significant cost. This system was not however designed to cope with the additional run off from the level of housing proposed at Paddock Wood and East Capel.

As a result, we have real fears that any large development at Paddock Wood will make our clients home vulnerable to flooding and will certainly also make the garden virtually unusable for most of the time.

The SHELAA for Tudeley Brook Farm, referenced 'DPC19', identifies the existing flooding constraints associated with the site. Despite this flood constraint, the SHELAA states that the site is suitable for development "*in conjunction with other sites for the strategic growth around Paddock Wood as the masterplanning associated with this growth will allow flooding to be considered properly, and facilitate new investment in flood infrastructure to provide betterment to the existing town.*"

In our submission to the Regulation 19 version of the Local Plan, we made it clear that our clients were happy for Tudeley Brook Farm to be included and used proactively to mitigate flood risk



elsewhere. We have also approached Crest to explore the possibilities of working together on several occasions but regrettably there has not been any uptake on this offer.

As a result, we have real concerns about this flood risk issue, which are further exacerbated when the draft policy provides loopholes (in the form of “exceptional circumstances”) for developers to proceed alone without an agreed drainage strategy in place.

If an “exceptional circumstance” relates to viability, then this is completely unacceptable. TWBC were prewarned by DLA about the difficulties of providing infrastructure at this site. A whole chapter was dedicated to “delivery” (Chapter 7) in the Strategic Sites Masterplanning and Infrastructure Study (February 2021) which highlighted various scenarios that could arise that would impact delivery - such as one developer meeting the full cost of infrastructure shared by all or one disproportionately contributing in a different way such as providing land. DLA made it clear that TWBC may have to step in to facilitate if developers are unable to form their own collaboration agreement or an alternative mechanism for the equal sharing of costs is not achieved. DLA pointed out that this should be completed in a timely fashion.

One year on from when this Study was published, and the issue of land equalisation agreements and comprehensive delivery remains uncertain. TWBC have not yet adhered to their own independent consultant’s advice as there have been no signs of “stepping in” to facilitate the process of collaboration between landowners. Instead, judging from the recently issued SOCG between the TWBC and Crest, it appears that TWBC are, in fact, happy that Crest are going to submit “*a planning application for the land within its control only*” (Paragraph 2.16) – which is both concerning and outside the parameters of Policy STR/SS1.

There is a separate section in the SOCG that deals with Flood Risk and Drainage which acknowledges the flooding and drainage issues in relation to the parts of land within the western parcel. Within this subheading, there is reference to both parties (i.e TWBC and Crest) working together in conjunction with the relevant statutory consultees to ensure the issues relating to flood risk and drainage are adequately addressed. Frustratingly, there is no reference to working with the owners of Tudeley Brook Farm.





Again, this raises real concerns for our clients. The SHELAA initially identified the flood mitigation benefits associated with including Tudeley Brook Farm within the wider site allocation. Following on from this, as part of the masterplanning process, DLA also recognised the opportunity the site could bring to the development in line with Paragraph 161 of the NPPF and consequently designated the site as part of the Green and Blue Strategic Landscape Corridor. Tudeley Brook Farm has therefore clearly been identified as providing an essential component of the wider flood alleviation measures that are so critical and necessary in this location to support the delivery of the new housing and as such it is important that it is fully accounted for.

As explained above, Policy STR/SS1 is vague, imprecise and lacks a level of commitment. It is not acceptable for a planning application to be submitted on a strategic site without all relevant parties and affected stakeholders signed up to an agreed drainage strategy. We respectfully ask the Inspector to tighten up this policy to fix the site boundaries and to ensure that there are no exceptions so that sites such as Tudeley Brook Farm are not left in isolation bearing a real extended flooding risk.

**Question 22 – What is the justification for requiring each parcel to be delivered through the production of a SPD?**

As explained above, the Structure Plan (Map 28) has been drawn on an ownership blind approach which fully maximises development potential without influence or favour on landowning interests. Initially, our client was supporting of this approach. On reflection, however, we have real concerns about how much weight the Structure Plan will actually hold in terms of delivering the entirety of the vision for Paddock Wood and East Capel. Instead, TWBC have decided to introduce another framework to guide development –Supplementary Planning Documents (SPDs).

However, these SPDs have yet to be produced. The Local development Scheme (LDS) sets out the timeframes for the preparation of these SPDs and shows that the western parcel SPD will be developed alongside the planning application, as the detailed masterplan work progresses.

The problem with this approach is that there is the real potential and opportunity for the larger landowners to work to their own agendas to the detriment of the wider comprehensive masterplanning approach. In our view, there is too much flexibility within the wording of Policy



STR/SS1. As currently drafted, this loose policy allows site promoters to “cherry pick” the most desirable aspects from the overall masterplan to suit their needs and then interpret these into an SPD.

This is not fair or transparent, especially given that the creation of these documents falls outside the examination process and they are not therefore subject to full public scrutiny and the rigours of an independent examination. Furthermore, smaller (but materially affected) landowners such as the Whetstone’s will have little involvement in the SPD process.

Accordingly, there must be greater commitment in Policy STR/SS1 towards reaching the stated ambitions of the overall masterplan (Map 28). It is noted for instance that Paragraph 5.196 of the supporting text of the submission version of the Plan explains that “*planning applications will generally need to accord with the broad objectives and principals set out in the SPD*”. In our view, this paragraph should be strengthened further to refer to the need for planning applications to adhere to the overall ambitions of the Structure Plan (Map 28) in the first instance.

Similarly, the actual wording of Policy STR/SS1 also needs to be strengthened. When referring to the SPDs, instead of saying on page 148 that: “*These Framework Masterplans, will guide developers and the Local Planning Authority in respect of the garden settlement principles to create a new community at Paddock Wood and east Capel*”

We believe the text should say:

“*These Framework Masterplans, along with the Structure Plan (Map 28), will guide developers and the Local Planning Authority in respect of the garden settlement principles to create a new community at Paddock Wood and east Capel*”.

Any other changes in this Policy that give greater strength to the Structure Plan (Map 28) would also be appreciated. Furthermore, we ask for the development boundaries to be fixed, and any reference in the Plan to “provisional” Limits to Built Developments are removed.



The purpose of adopting an ownership blind masterplanning approach can and reasonably should be questioned now that it has become established that all the masterplanning work is actually going to be done at a later stage through the SPDs.

It should be noted that our clients were required to contribute to the costs associated with the masterplanning (this was because of being asked to be involved with the Strategic Sites Working Group). It was our understanding that the infrastructure provision would be defined as part of this masterplanning process. It is not acceptable that Crest are now allowed to proceed alone in the form of an SPD without the agreement of the other landowners that make up part of the strategic allocation. This is a strategic matter which must be addressed now, and certainly not later in the planning process via an SPD.

**Question 23 – How will the Council ensure that the allocation comes forward in a coherent and comprehensive manner and avoids the piecemeal development of individual sites?**

The strategy as set out in Policy STR/SS1 is unclear. The most logical way of ensuring that the allocation comes forward in a coherent and comprehensive manner is to remove any reference to “provisional” Limits to Built Development. Instead, the boundaries of the Limits to Built Development should be fixed now thereby ensuring that the whole of the site allocation comes forward which will stop piecemeal development. This will also ensure that the infrastructure improvements line up with masterplanning and will form the basis for a comprehensive policy that can deliver sustainable growth.

Accordingly, we ask for the development boundaries to be fixed in Inset Map 4 – Paddock Wood, Map 27 (Masterplan Areas) and Map 28 (Structure Plan) in order to ensure the comprehensive delivery of the site overall.

Policy STR/SS1, as it is currently written, fails to ensure that the allocation will come forward in a comprehensive manner. This is because the policy is non-committal with the wording embedded with ambiguity.

One particular example of this ambiguity is the reference to the Limits to Built Development only being “provisional”. With the exception of the Tudeley Village allocation, all other site allocation



boundaries coming forward in the Plan are fixed. Accordingly, there is no need for this flexibility and discretion which only serves to promote confusion with the Limits to Built Development within Policy STR/SS1.

TWBC incurred considerable costs instructing independent experts (David Lock Associates) in order to ensure that any expansion and development at Paddock Wood was planned and delivered according to garden community principles. As a result, an ownership blind approach to the masterplanning of the expansion of Paddock Wood was adopted by DLA. This in turn led to the production of the Strategic Sites Masterplanning and Infrastructure Study (February 2021) and the creation of a Structure Plan (Map 28 in the Local Plan) built upon a comprehensive approach to delivery. This extensive masterplanning exercise resulted in the identification of boundaries to ensure that that all the necessary infrastructure requirements can be met.

Yet despite this, the boundaries for development around Paddock Wood remain provisional. Paragraph 5.195 of the supporting text to Policy STR/SS1 explains that these boundaries will “*remain provisional as part of the Plan to allow for further detail to be considered and agreed at planning application stage, which may alter these boundaries accordingly. Following the grant of outline planning permission for the parcels of land identified at Map 27, the LBD will be agreed and fixed through the five-year review of the Local Plan*”.

These boundaries should be fixed now to provide clarity and to ensure that local residents are clear on the extent of the proposed built development around Paddock Wood. This will also assist local planning officers who will then have certainty in respect of the planning boundaries, and should reduce disharmony with the local community. Leaving such important matters to the planning application stage directly contradicts the advice given in Chapter 3 of NPPF which states that the planning system should be “**genuinely plan-led**” (paragraph 15). It is also at odds with Paragraph 23 of the NPPF which states that “Strategic policies should **provide a clear strategy for bringing sufficient land forward**, and at a sufficient rate to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.

Specific improvements to Policy STR/SS1 are also sought to the wording of the penultimate paragraph of Policy STR/SS1. On the face of it, the statement that “*Proposals for the piecemeal development of individual sites within the parcels identified will not be supported*” is positive and



shows a commitment from TWBC to ensure that the allocation comes forward in a coherent and comprehensive manner. However, on closer examination this commitment only relates to “*parcels of land*” that have yet to be identified (i.e on land to be agreed in due course within the four Framework Masterplan Supplementary Planning Documents).

There is no logical reason to defer crystallising the land boundaries to the SPD stage. Instead, boundaries should be fixed now to ensure that the allocation comes forward in a coherent and comprehensive manner. For the plan to be found sound, there should not be any ambiguity in respect of land boundaries. The extensive masterplanning exercise undertaken by DLA has already identified suitable boundaries for the site to ensure that all the necessary infrastructure requirements can be met. Accordingly, there should not be any ambiguity in respect of land boundaries and the wording should be tightened up to ensure that the plan is positively prepared and is deliverable. We recommend altering the penultimate paragraph of Policy STR/SS1 to read:

*“Proposals for the piecemeal development of individual sites **within the parcels of land fixed in Map 27** will not be supported”.*

It is interesting to note that Policy STR4 which deals with Ensuring Comprehensive Development similarly defers the masterplanning work to the SPD stage. This approach is unsound and separate detailed representations have also been submitted by KLW in relation this specific policy which again stresses the importance of the work undertaken to date by DLA. It is our assertion that TWBC should be guided by this independent advice and that the site boundaries as identified in Inset Map 4, the Masterplan Areas (Map 27) and the Structure Plan (Map 28) should be fixed now to ensure that all landowners/parties understand what is proposed at the earliest opportunity rather than deferring this work later down the line and out with the scrutiny of the public inspection.

As things stand, there is no agreement between the various landowners within Paddock Wood/ East Capel strategic site. All of the land within this allocation is fundamental to achieving sustainable development. Regrettably, TWBC and Crest have made it explicitly clear in the Statement of Common Ground (SoCG) between TWBC and Crest that Crest will “*submit a planning application for the land within its control only*” (paragraph 2.16). Based on the information provided in the SoCG, it appears that piecemeal development is already underway, with Crest already looking to develop



the western parcel of land on its own, without the involvement of any other landowners (such as our client's site at Tudeley Brook Farm) which is clearly unacceptable and contrary to policy STR/SS1.

The inherent flexibility in the wording of Policy STR/SS1 (as currently drafted) only serves the larger landowners to the detriment of the wider comprehensive master planning approach. In the interest of delivering comprehensive development and in order to ensure that Policy STR/SS1 is prepared positively and with the objective of contributing to the achievement of sustainable development, the wording of the policy must be tightened up and overall site boundaries and the Limits to Built Development should be fixed now.

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We look forward to participating in the debate and expressing these points further at the Hearing on 15<sup>th</sup> June 2022.

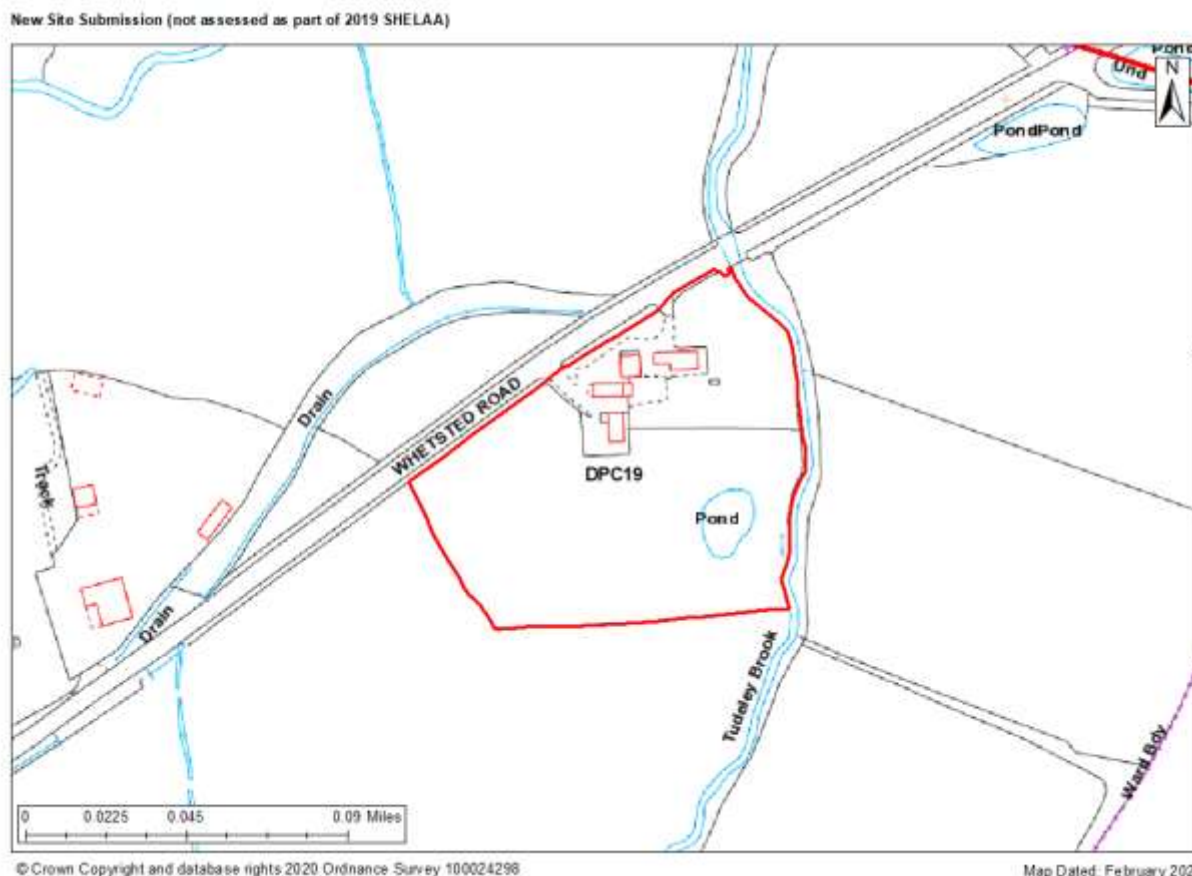




# APPENDIX 1

# Site Reference: DPC19 (Local Plan Allocation STR/SS 1 (site is part of larger allocation))

**Site Address: Tudeley Brook Farm, Whetsted Road, Paddock Wood**



<b>Parish:</b>	Capel
<b>Settlement:</b>	Paddock Wood
<b>Gross area (ha):</b>	1.95
<b>Developable area (ha):</b>	Subject to Masterplanning
<b>Site type:</b>	Part PDL/ Part Greenfield in Green Belt.
<b>Potential site use:</b>	Mixed use including residential and community use.
<b>Potential yield if residential:</b>	c. 3,600 in conjunction with other sites forming wider site allocation. See Strategic Sites Masterplanning and Infrastructure Study.
<b>Issues to consider:</b>	MGB; Flood Zone 2; Flood Zone 3; HLC Period: Late 20th century; APA: General background archaeological potential; ALC: GRADE 3; LCA: Low Weald Farmland;

<b>Site Description:</b>	This site comprises a residential dwelling and gardens, and stables. It is accessed directly from the A228 and adjacent to a PROW. There are no pavements in the locality of the site. The site boundaries are a mix of hedgerows, fencing, trees and walls. Open countryside surrounds the site.
<b>Suitability:</b>	<p>The site is in proximity to the LBD at Paddock Wood. The site is likely to be sustainable in this context and in conjunction with other sites would provide a sustainable and logical location for the strategic expansion of Paddock Wood, including land in east Capel. This would overcome the lack of access from the site as it stands.</p> <p>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 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. Potential mitigation measures are set out to reduce the potential visual influence of development on the Green Belt land. The masterplanning work can have regard to this. There is also scope for compensatory improvements such as hedgerow planting, enhanced pedestrian routes or conversion of fields from arable to grassland.</p> <p>The site is also constrained by flooding, with portions of the site falling within Flood Zones 2 and 3. The site is considered suitable in conjunction with other sites for the strategic growth around Paddock Wood as the masterplanning associated with this growth will allow flooding to be considered properly, and facilitate new investment in flood infrastructure to provide betterment to the existing town.</p>
<b>Availability:</b>	Available Single ownership
<b>Achievability:</b>	This site is considered suitable. It is available and in single ownership. It is likely that the site could be delivered within the Local Plan period.
<b>Sustainability Assessment:</b>	<p>Air quality is given a mixed score. There is a high risk to deterioration of local air quality, with traffic increasing substantially and improvements to the road network at Colts Hill being important. Conversely, active and shared transport options would be given large investments and significant betterment could be seen. However, the improvements would always be working within the confines of Paddock Wood town so can never be given the maximum scores. Travel scores are applied following a similar logic.</p> <p>Generally, biodiversity constraints are limited. There is no risk to the Ashdown Forest and there are 5km SSSI risk zones to the south and north east of the town.</p>

Business score is positive reflecting the number of new customers that could support existing businesses and the likely significant provision of new business space. However, this is offset by losses to the rural economy from developing upon agricultural fields. For this reason, positive scores do not reach the maximum.

Climate change scores reflect the increase in energy and fuel demands created by the scale of new development with consideration of the fact that a master planning approach is more likely to implement adaptation measures and support alternative fuels.

Deprivation scores positively to reflect the substantial regeneration benefit to Paddock Wood town which contains areas of high-income deprivation. However, the maximum score cannot be applied as the development is unlikely to address existing problems of fuel poverty.

New educational pressures are expected to be met by provision of new or extended schools. Adult education facilities are not considered, and it is expected that Royal Tunbridge Wells would continue to meet this demand.

Paddock Wood does not currently have low employment levels so is not a key ward for a focus on employment. However, the development would provide the benefit of new employment space and job creation, which would offset the loss of agricultural jobs from development on agricultural fields.

Equality score is positive with significant regeneration expected to benefit the existing areas of income deprivation, and access to facilities for those with impairments felt to be possible with a strong master planning approach.

The health objective scores positively due to the provision of sports facilities that would help improve physical activity rates and the locality meeting 4 out of 5 Accessible Natural Greenspace Standards. It was also felt likely the proposals would include provision for elderly care services and improvements in ANG.

A negative heritage scores reflects the land take required and thus negative impacts that would occur largely upon the setting of heritage assets, with assets in the south being most sensitive. However, it was felt that the master planning approach could help ensure a strategy for enhancements was realised.

The maximum positive scores is applied to the housing objective for provision of substantial numbers of new dwellings including affordable and accessible.

Loss of greenfield land with Best and Most Versatile soils causes land use to be scored negatively. The score also reflects the release of Green Belt land with overall harm rating of High.

	<p>The landscape score follows a similar logic to heritage reflecting encroachment into the High Weald Character Area in the south. The negative noise scores reflects the scale of development and the location of development adjacent to the railway line.</p> <p>Minimal demolition would be necessary to facilitate development. Choice of materials would be determined at Development Management stage. Master-planning approach for a large development and strong sustainability credentials expected as part of policy wording makes responsible sourcing of materials more likely. Impact on Superficial Sub-Alluvial River Terrace deposits would require investigation.</p> <p>Services and Facilities scores positively reflecting the reasonable range of services in Paddock Wood and fact that some services would be outside of desirable walking distances for some new residents (e.g. health centre).</p> <p>A mixed water scores is applied as the development would represent a substantial demand for water and wastewater treatment, and would provide significant benefits to Paddock Wood and Capel in the form of reductions in existing flood risk. An improvement to flooding issues for existing residents is one of the key justifications for the proposed release of this Green Belt land on the west side of the settlement.</p>
<b>Conclusion:</b>	The site is suitable as a potential Local Plan allocation.
<b>Reason:</b>	<p>The site is sustainable and would form a logical extension of the LBD for Paddock Wood in conjunction with other site submissions.</p> <p>Subject to the demonstration that there are exceptional circumstances to release this land from the Green Belt, and that matters such as the provision of appropriate infrastructure (including transport) and mitigation of flooding impacts can be addressed through a masterplanned approach, the site is considered suitable in conjunction with other sites for the strategic expansion of Paddock Wood.</p>