

The Right Homes In The Right Places?

A response to TWBC's Draft Local Plan

February 2017:

The government calls for 'the right homes in the right places'.

[Fixing our broken housing market. A housing white paper]

July 2019:

TWBC responds with the wrong homes in the wrong places.

[Tunbridge Wells Borough Draft Local Plan Regulation 18 Consultation Draft]

by Laurie Dunkin Wedd, November 2019

The Right Homes In The Right Places?

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1. Personal statement

My beloved mum died just over a year ago: we buried her at All Saints' Tudeley.

She loved All Saints' Tudeley, and served for some years as secretary of the PCC. She was passionate about the countryside, and was a lifelong member of CPRE. We thought it was so appropriate that from her grave one could see the wonderful view across the Medway valley:



It had given us great comfort to know that she was to be buried in sight of this beautiful rural view, one of our favourites in Kent. My wife wishes to be buried at Tudeley, and as a local, born and bred in Kent, it was my hope to be buried there too.

So you can imagine our distress when we saw the plans for the proposed Tudeley Village. It was devastating to think that there might be a new housing estate within a few yards of our graves. It is hard to see how this will 'respect the setting of... All Saints Church'.

I love to hear the skylarks singing from the field to the south of the church; how sad if they must go.

The ground has now settled enough for a headstone, and we had chosen the inscription from Psalm 121: 'I will lift up mine eyes unto the hills'. That inscription is looking bitterly ironic now - if it is to look like this:



That's my personal sadness.

But there are also innumerable reasoned arguments against this project. Here are some of them.

2. The Right Homes?

i) What TWBC is required to do

“The Plan is required to meet the full assessed need within the borough for market and affordable housing of 678 per annum” [Draft Local Plan 2.31 page 27]

This sounds incontrovertible, doesn't it?

But it simply isn't true.

Here is the latest government advice on the subject:

“The National Planning Policy Framework is clear that, to enable effective planning of new homes, local planning authorities should start the plan-making process with a clear understanding of the number of new homes that they need in their area.

While this is an essential first step, it is not the only stage in the process. Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need.

These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest.

They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”

[www.gov.uk/government/publications/fixing-our-broken-housing-market]

So it is clear that:

- **TWBC must balance housing need with environmental considerations**
- **TWBC cannot determine local housing need until they have consulted other authorities**

Neither of these conditions has been met. TWBC's draft Local Plan has not followed NPPF guidelines and is therefore unsound in general and in detail.

The following pages demonstrate how far TWBC's plan is from meeting these - and other - conditions.

* **There is NO housing shortage! (But there IS a crisis.)**

The UK has 28.1 million residences (ONS 2014) and 27.6m households (ONS 2018)

* **The crisis is a shortage of AFFORDABLE HOUSING**

Average UK home costs eight times average earnings (Conservative Party Conference 2017)

* **Tunbridge Wells has a very poor record of provision of AFFORDABLE HOUSING**

1,705 needed, just 580 provided in 2012-2017 (W Kent Housing & Homelessness Strategy)

* **There IS a problem of distribution**

1.5m people own multiple homes (ONS) while others have none at all

* **There IS a problem of inequality**

UK inequality is second worst in Europe (OECD Social and Welfare Statistics 2017)

* **There IS a problem of money laundering and tax evasion**

UK property market is particularly attractive (draft Registration of Overseas Entities Bill 2018)

* **The Tunbridge Wells Borough Draft Local Plan will address NONE of these problems**

Green Belt provides executive housing, not affordable homes (GPPE Oct 2019)

* **Instead the Tunbridge Wells Borough draft Local Plan will create a ghetto for the wealthy**

Average house prices: SE England = £383,422; Tudeley = £715,000 (Zoopla)

i) There's no housing shortage - there's a crisis

We have all heard that we are short of millions of homes, and that we must build hundreds of thousands of new ones a year to address the situation.

TWBC's draft Local Plan appears to agree:

"The rising household numbers, coupled with an ageing population, mean that the Council will continue to need to provide a mix of housing types and sizes, including specialist forms of housing. This presents a challenge for the new Local Plan, as it will need to facilitate the delivery of affordable housing... [Draft Local Plan, section, 2.30 p27]"

Whilst it is well-known to almost everyone, it's worth asking if this housing shortage does, in fact, exist?

It does not.

So says Ann Pettifor, Director of Policy Research in Macroeconomics, Fellow of the New Economics Foundation, and author of *The Case for the Green New Deal*.

And the statistics back up this view:

“In 2014, there were 28 million dwellings in the UK, but only a predicted 27.7 million households in 2016. As the director of consulting at Oxford Economics, Ian Mulheirn, highlights, London’s number of dwellings grew faster than the number of households between 2001 and 2015.”
[\[www.theguardian.com/commentisfree/2018/jan/27/building-homes-britain-housing-crisis\]](http://www.theguardian.com/commentisfree/2018/jan/27/building-homes-britain-housing-crisis)

The Office of National Statistics confirms it:

The UK Housing market comprises 28.1 million residential properties in 2014. Linked to income, wealth and availability of lending, the housing market is sensitive to the overall economic climate.

Housing policy in the UK is detailed and complex. Links are available in the related links. This article in the UK Economic Perspectives series presents some UK national trends.

1. Current rising house prices

The ONS mix-adjusted House Price Index (HPI) is a measure of house price inflation over time and is calculated as a weighted average of prices for a standard mix of tenure. This focuses the effect of the changing composition of properties.

Mix-adjusted House Price Index (HPI), UK, 1980 to 2015

5. The number of people living alone

9. Quality and affordability

1. Main points

- In 2018, there were 19.1 million families in the UK, an increase of 8% from 17.7 million in 2008.
- The number of cohabiting couple families continues to grow faster than married couple and lone parent families, with an increase of 29.8% over the decade 2008 to 2018.
- The number of same-sex couple families has grown by more than 50% since 2015, with more than four times as many same-sex married couple families in 2018 compared with 2015.
- In 2018, there were 27.6 million households, an increase of 350,000 on the previous year and 1.7 million since 2008.
- The number of people living alone in 2018 has surpassed 8 million, up from 7.7 million in the previous year, driven by increases in women aged 45 to 64 years and men aged 65 to 74 years.

[\[https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2018\]](https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2018)

[https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/ukperspectives2016housingandhomeownershipintheuk/2016-05-25\]](https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/ukperspectives2016housingandhomeownershipintheuk/2016-05-25)

ii) So where have all the homes gone?

And yet, there is certainly a housing **crisis**, characterised by increasing homelessness and a shortage of homes for first-time buyers, making it impossible for our young people to get onto the housing ladder.

According to Theresa May addressing the Conservative Party Conference in 2017, the average UK home cost eight times average earnings; mortgages are limited to 4.5 times salary.

Where does the problem lie? How can be it that we have more homes than families, and yet still not enough homes for everyone?

a) Some have several while others have none

First of all, some people have several houses, while others have none.

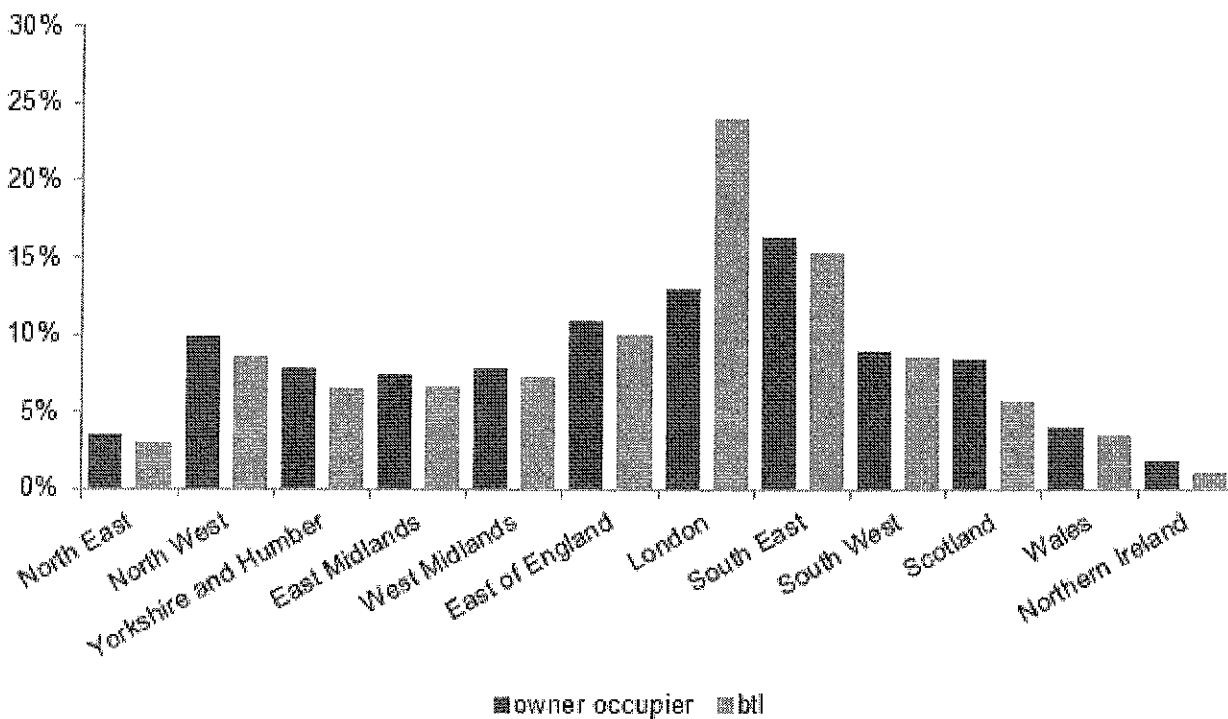
“At the time of the 2011 Census, 1,570,228 usual residents in England and Wales (2.8 per cent of the usual resident population) reported having a second address in another local authority in England and Wales, that they used for 30 days or more each year”.

[www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/2011censusnumberofpeoplewithsecondaddressesinlocalauthoritiesinenglandandwales/2012-10-22]

b) Buy to let reduces the market

Second, an increasing number of property owners own homes that they do not live in.

In recent years, buy-to-let has grown exponentially, removing homes from the sale market. Between 1999 and 2015, lenders advanced 1.7 million loans for buy-to-let houses, according to the Council of Mortgage Lenders. This trend was especially marked in the south east, as the chart shows.



[Council of Mortgage Lenders cml.org.uk]

That's 1.7 million homes removed from the market - fully 6% of the total. Their owners are wealthy enough to own two or more houses, and they rent the spare ones out, at a profit, to people who cannot afford to buy a house.

So those who can afford to own more than one property make an income from the rent paid by people who can't afford to buy even one.

c) The top of the market sequestered

Thirdly, property at the top of the market is made unavailable through tax avoidance and money laundering.

The National Crime Agency suggests that “the scale of money laundering impacting the UK annually is in the hundreds of billions of pounds”.

[www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/money-laundering-and-terrorist-financing]

“£180 million worth of property in the UK has been brought under criminal investigation as the suspected proceeds of corruption since 2004”, said our local MP and then Business Secretary Greg Clark, introducing the government’s plan for a Register of Overseas Entities.

[www.gov.uk/government/news/world-first-register-to-crack-down-on-criminals-laundering-dirty-money-through-uk-property-market-to-go-live-by-early-2021]

In 2015 the London Mayor’s office reported that 36,342 London properties were held by offshore haven companies. Not even the Land Registry knows who owns these homes.

[www.london.gov.uk/questions/2015/1366]

According to the Standard, “Land Registry figures also show that in just one deal signed off by Boris Johnson in 2011, at Riverlight Quay in the Nine Elms regeneration area, 15 per cent of the homes sold so far have been bought by foreign firms.”

[www.standard.co.uk/news/london/revealed-how-foreign-buyers-have-bought-100bn-of-london-property-in-six-years-a3095936.html]

Almost one in ten (9.3 per cent) properties in the borough of Westminster were owned in 2016 by offshore companies, say Transparency International.

[www.independent.co.uk/news/uk/crime/the-uk-is-a-global-corruption-centre-campaigners-claim-a7058126.html]

Is this a London thing, entirely irrelevant to Tunbridge Wells?

Not at all. The UK total is certainly much more. In 2015, Private Eye’s research linked more than 100,000 land title register entries to specific addresses around the country.

And it’s not just someone else’s problem: two-thirds of the purchases were made by companies registered in just four British tax havens - Jersey, Guernsey, the Isle of Man and the British Virgin Islands.

[www.private-eye.co.uk/registry]

OECD figures show that UK incomes are already the most unequal in Europe, save only for Lithuania. The people at the bottom of the housing ladder have no hope whatever of buying a home, however many we build.

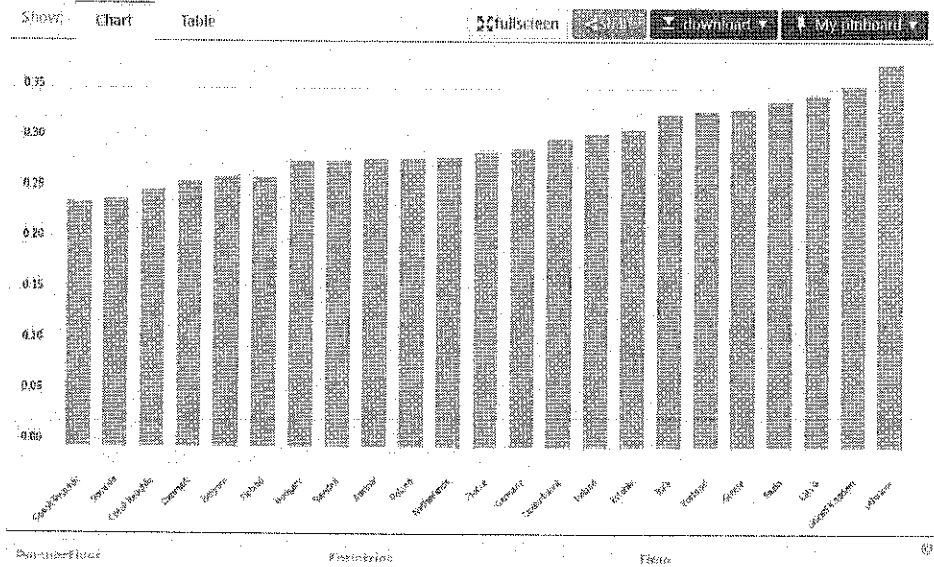
Indicators

- Income inequality
- Poverty rate
- Poverty gap
- Discriminatory family code
- Violence against women
- Women in politics
- Social Institutions and Gender

Income inequality

Gini coefficient, 0 = complete equality; 1 = complete inequality, 2017 or latest available

Source: OECD Social and Welfare Statistics: Income distribution



Some people own many homes, whilst other people have none. It's a problem not of housing shortage but of inequality, and as Pettifor says, you can't build your way out of that.

We will not address the gap between rich and poor by allowing already wealthy landowners and property developers to submerge Tudeley under concrete.

iii) How should Tunbridge Wells respond?

It is obvious that these are structural inadequacies, quite out of the power of TWBC to affect, and more suitably addressed at national and international level.

But TWBC cannot just carry on building executive homes on Green Belt as if these issues did not exist.

It is crucial that TWBC plays its part. It must keep up to date with recent analysis, it must deal with the problems as best it can, and if necessary it must respond to government that the portrayed housing demand is inaccurate, and the imposed solution (just build more houses) unworkable. Sevenoaks' response to government has been imaginative, though controversial.

Have TWBC taken any account of any of these meta-problems? Apparently not: it seems they have swallowed whole and unquestioningly the view that any new houses, built anywhere, are a good thing. TWBC's response has been merely supine.

And yet the only people who will benefit from Tudeley New Town will be the property developers and the land-owner - whose own assets may already be offshored to Ireland for tax.

What kind of property will actually help to counter all these threats? An estate of Persimmon Homes, Dandara and Berkeley homes is not the solution. Nor is a luxury Poundbury development, commanding prices one third higher than those around it.

What is the local situation in Tunbridge Wells, and how should TWBC respond?

Answering a 2017 Freedom of Information Request by Chris Gerry, TWBC stated that there were in 2017 just 20 rough sleepers in Tunbridge Wells.

[\[www.whatdotheyknow.com/request/information_on_rough_sleepers_in_FOI_F06396\]](http://www.whatdotheyknow.com/request/information_on_rough_sleepers_in_FOI_F06396)

And on March 31 2016, there were 994 households on the borough council's housing register, of whom 430 needed one-bedroom accommodation, and 363 needed two-bedroom. [**West Kent Housing and Homelessness Strategy**]

TWBC bases its plan on national and local housing need, using Central Government's 2014 household projections data [**TWBC Housing Supply and Trajectory Topic Paper, p1**]. This data is five years out of date, and has been superseded by more recent - and much lower - projections.

Only on 12 September 2019, Housing Minister Esther McVey MP announced a crackdown on developments on the nation's Green Belt, saying:

“Once the Green Belt is built on it's often gone for good: that's why we are determined to protect it. The public have told us loud and clear they want it kept for future generations to enjoy”.

[Ministry of Housing, Communities & Local Government, 12 September 2019]

Perhaps TWBC's aim is to provide homes for social rent?

These would certainly be the only type of homes that would be immune to the inflationary effect of oligarchs, investment funds and offshore trusts. They would not contribute to house inflation. And they would actually begin to tackle TWBC's local housing need. And there is good evidence that council houses are increasingly being seen as the local solution.

After all there have been famous recent successes such as Norwich, winner of the 2019 RIBA Stirling Prize for its Goldsmith Street development, or the Bourne Estate in Holborn.



[Council housing: it's back, it's booming and this time it's beautiful - Oliver Wainwright, Guardian, 20 June 2019]

And mayor of London Sadiq Khan has negotiated a £1bn fund from central government to build 11,000 new council homes over the next four years, set explicitly at social rent levels.

[<https://governmentbusiness.co.uk/news/24102018/%C2%A31bn-plan-build-11000-new-london-council-homes>]

Perhaps TWBC has something similar in mind?

But the phrases 'council house' and 'council housing' are entirely absent from the draft local plan. Nor does the term 'housing association' appear. The words 'social housing' appear only as a definition on page 529. In fact, TWBC seems to have entirely overlooked a number of modern trends in housebuilding.

Whatever the reason, Tunbridge Wells BC is clearly not about to embark on on a major programme of council house building.

So the focus is firmly on affordability: in its *West Kent Housing and Homelessness Strategy*, TWBC speaks almost exclusively about affordable housing.

v) Affordability - what is it?

Ambition 2 — Improving housing supply	
To deliver this objective, we will	
1	Work with housing providers to deliver new affordable homes across the West Kent local authorities, promoting a range of types and tenures of affordable homes that will meet local needs.
2	Maximise the resources available to provide new affordable homes through the HCA and other funding sources, and through planning gain.
3	Work together with our partners to manage the reduction in grant funding for affordable housing by exploring different delivery and financial models and attracting new investors into West Kent

[\[www.tunbridgewells.gov.uk/residents/housing/affordable-housing/west-kent-joint-housing-and-homelessness-strategy\]](http://www.tunbridgewells.gov.uk/residents/housing/affordable-housing/west-kent-joint-housing-and-homelessness-strategy)

The draft plan is similarly ambitious for affordable homes. This may be a panic reaction to such unfavourable headlines as 'The borough is falling woefully behind... in 2013-14 just 36 affordable homes were delivered...'

[\[www.kentlive.news/news/kent-news/affordable-housing-hard-come-tunbridge-492345\]](http://www.kentlive.news/news/kent-news/affordable-housing-hard-come-tunbridge-492345)

But no numbers are given. And what is meant by 'affordable'? The national planning policy definition is homes that cost 20% below the market rate or less.

[\[NPPF Revised July 2018, Annex 2\]](#)

The average house price in Tudeley is £715,000. [\[www.zoopla.co.uk/house-prices/tudeley\]](http://www.zoopla.co.uk/house-prices/tudeley)

By the NPPF definition, then, an 'affordable' home would cost up to £572,000.

Who will buy an 'affordable' home in Tudeley?

The average house price in Tudeley is £715,000. [www.zoopla.co.uk/house-prices/tudeley/]

By the NPPF definition, an 'affordable' home would cost £572,000.

According to Halifax, the average deposit put down by those buying their first home in the first half of 2018 was 16%.

[<http://static.halifax.co.uk/assets/pdf/mortgages/pdf/halifax-first-time%20buyer%20review-13-january-2017-housing-release.pdf>]

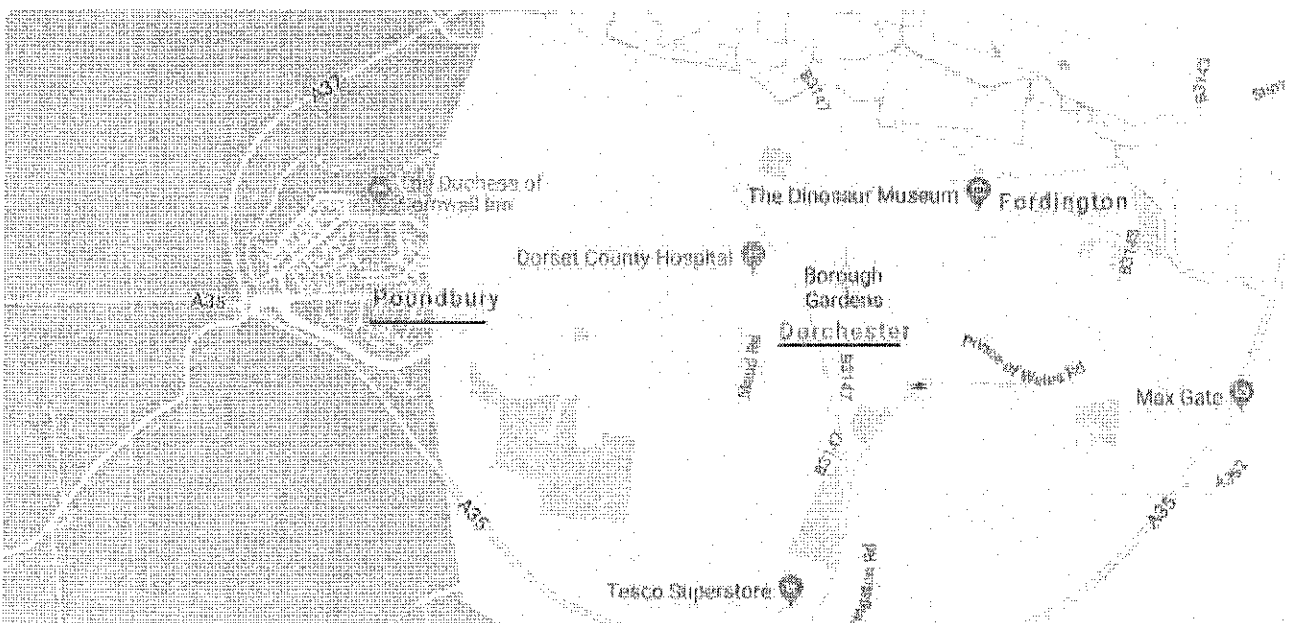
16% of £572,000 is £91,500, leaving a balance of £481,000. Using the standard loan-to-income ratio of four and a half times income, we can see that this 'affordable' home will only be available to those with an income in excess of £107,000 pa.

With a £91,500 deposit, a Halifax tracker mortgage over 35 years for the balance of £481,000 [www.moneysavingexpert.com], will have monthly repayments of £1,928 for 26 months, and then £2,539 for 22 years and 10 months - or £30,468 per year.

The average salary for a registered nurse in the UK is £24,664 [www.payscale.com]. The national average salary for teachers is £30,097 [www.glassdoor.co.uk].

Perhaps the new homes will be priced lower than average house prices in Tudeley? That's not what has happened in Poundbury, on which the new development is being modelled.

Poundbury homes are now 27% more expensive than those in Dorchester, just walking distance away. [www.rightmove.co.uk/house-prices/Dorchester.html]



If that happened in Tudeley, the new homes would not cost £715,000, but a whopping £908,000.

In fairness, however, maybe we should compare the new housing not with Tudeley's luxurious homes, but with those in less-eligible Five Oak Green nearby. The average house price paid there is a mere £512,500 [www.zoopla.co.uk] - though applying the Poundbury/Dorchester factor would take that to £650,000.

These prices are still not affordable for our teachers and nurses.

And there won't be many of such houses, either. Building on Green Belt land turns out not to produce many affordable homes: located in beautiful rural settings, the houses tend to be overwhelmingly 'executive' (ie expensive) houses.

In fact, 'affordable' homes make up just 13% of those built on land that was previously Green Belt. [**CPRE Report 'Space to Breathe' October 2019**]

So of our 2,800 Tudeley homes, 2,436 (87%) will be at full price - something close to a million pounds. Of the whole estate of 2,800, just 364 will be at <80% of full price - probably not less than £650,000.

So 364 'affordable' homes at £650,000? This is still a long way from the 1,200+ needed as identified by TWBC's West Kent Housing & Homelessness Strategy.

If the objective is to generate affordable housing in our area, this seems an oddly inefficient way to go about it.

3. In The Right Places?

i) Green Belt:

TWBC Development Strategy:

“Prevent urban sprawl by keeping land permanently open”

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open to maintain the character of the Green Belt. Once established, Green Belt boundaries should only be altered in exceptional circumstances and should be fully evidenced and justified, through the preparation or updating of a Local Plan.”

[TWBC draft Local Plan 4.48]

TWBC’s own analysis of Green Belt of July 2017 identified five purposes:

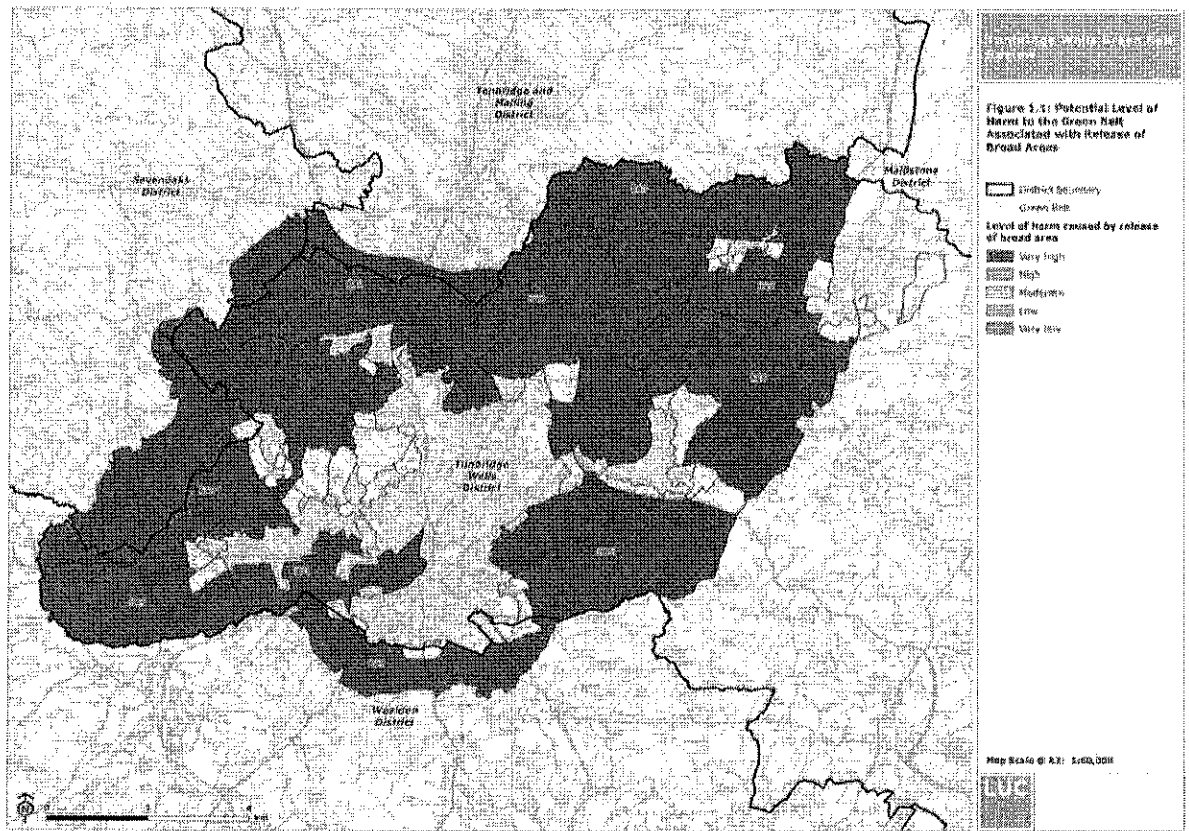
- Purpose 1: Check the unrestricted sprawl of large built-up areas;
- Purpose 2: Prevent neighbouring towns from merging;
- Purpose 3: Assist in safeguarding the countryside from encroachment;
- Purpose 4: Preserve the setting and special character of historic towns; and
- Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land

[Tunbridge Wells Green Belt Study, July 2017, Stage Two, section 1.2]

The development proposed would appear to fail at least on the first four of these counts.

TWBC also admits that the Local Plan “does not designate other land as ‘replacement’ Green Belt to replace that to be removed”. In other words, there will be a net loss of Green Belt; the plan offers to mitigate this, but does not specify how.

The Green Belt Study (July 2017) determined a Very High Level of Harm to the Green Belt Associated with Release of Broad Areas in an area covering Tudeley; but Tudeley is not examined individually. Presumably the Tudeley plan came in too late for inclusion - has proper consideration been given to these issues - or is this another sign that the plan has been rushed?



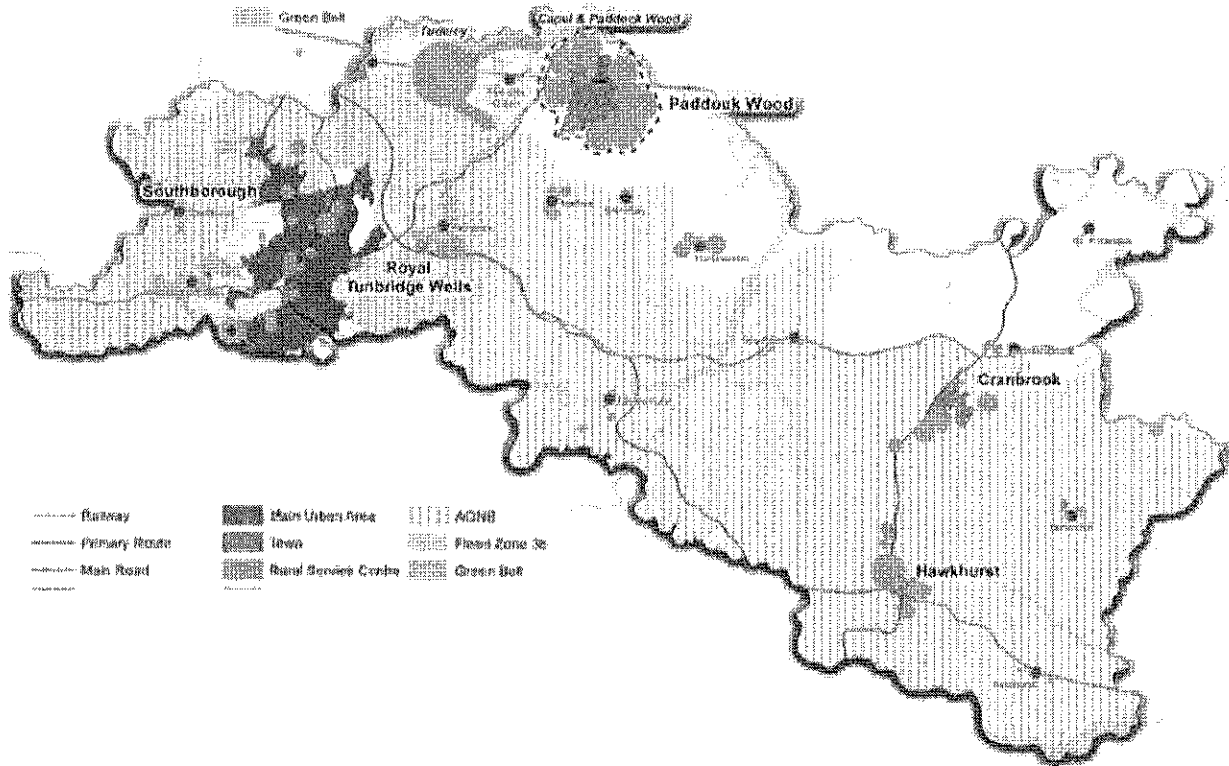
[Tunbridge Wells Green Belt Study, July 2017]

Comparison is made with other nearby boroughs. TWBC notes that “Sevenoaks District Council is not proposing to wholly meet [sic] its housing need”, and that “the constraints applying to Sevenoaks apply similarly to this borough”. [TW Draft Local Plan 4.8, page 34]

Government analysis of Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest shows that Sevenoaks has 94% of such areas, leaving only 6% of other kinds, while TWBC has only 75%. In other words, 25% of TWBC’s area is NOT Green Belt, AONB or SSSI. [www.gov.uk/government/uploads/system/uploads/attachment_data/file/644783/Housing_Need_Consultation_Data_Table.xlsx]

Clearly Sevenoaks can build very little if at all without infringing protected areas. But despite making the comparison, TWBC is entirely different, with 8,000 of its 33,000 hectares available for development.

But TWBC’s draft Local Plan takes no account of this. Instead it plans to build a large portion of its new homes entirely on the 22% of its land which is Green Belt. It’s hard to see this as anything but perverse.



[Map from Draft Local Plan Summary leaflet, pp4-5, my annotation]

TWBC's strategic objective number 9 is "To establish garden settlements as a model for the future delivery of development in the borough."

TWBC's argument is that Tudeley is the only place they can put such a settlement. But it is to be the model for others. If Tudeley is the only possible location, then where are these other future settlements to be?

And if there are other possible sites, why are these not being considered now?

TWBC admits that the convenience of dealing with just one landowner is a factor in its decision. The inspector may consider that mere convenience should not drive decision-making in the planning arena.

ii) Flooding:

The European Commission's guidance on Flooding Best Practice - though long - is well worth reading. It's pretty clear that no one at TWBC has done so. Here's a flavour:

"human interference into the processes of nature should be reversed"

"restore rivers' natural flood zones"

"strategy should cover the entire river basin area"

"one should not pass on water management problems in one region to another"

"shift from defensive action against hazards to management... [to] include rare events"

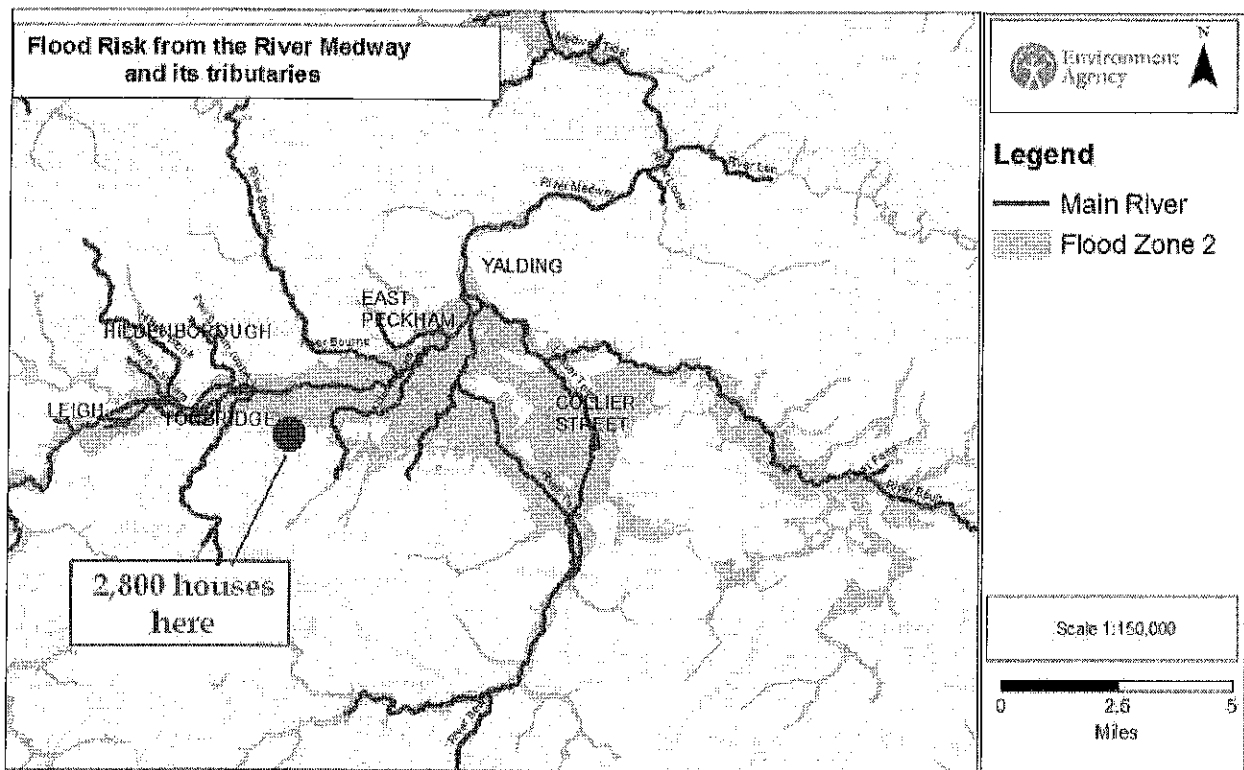
“flood protection is never absolute, and may generate a false sense of security”

[European Commission Environment Directorate: Best Practices on Flood Prevention, Protection and Mitigation:

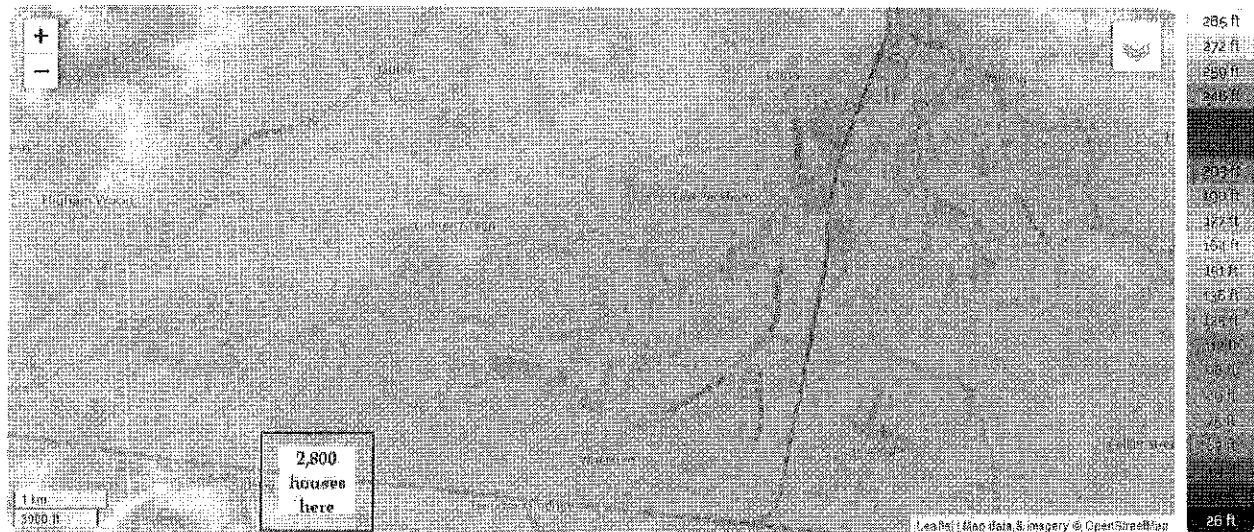
https://ec.europa.eu/environment/water/flood_risk/pdf/flooding_bestpractice.pdf]

A cursory look at the Environment Agency’s long term flood risk maps shows how seriously we must take this problem. It is not sufficient to kick it into the long grass to be dealt with at the masterplanning stage.

[<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>]



The topographical map shows how adding impermeable surfaces in the suggested area will create rainwater flows downhill directly into the Medway:



Kent, South East, England, United Kingdom (51.24748 0.71051)

Further maps appended.

There must be huge concern for communities downstream, such as Maidstone or Yalding, so heavily hit in 2000 and again at Christmas 2013.



Recent plans to protect this part of the Medway basin have been dropped, leaving the area especially vulnerable. The cost of the 2013 flood to local business alone was estimated at £100m.

[www.bbc.co.uk/news/uk-england-kent-36973257]

Acknowledging the huge risks, TWBC's plan offers: 'flood storage/attenuation/mitigation areas to reduce the flood risk to particular existing residential areas in Five Oak Green and Paddock Wood'. [Policy STR/CA 1, page 156]

The details of such mitigations are left to the masterplanning stage - when it will be too late to pull back if such mitigations turn out to be impractical or uncertain.

TWBC's mitigations are unspecified - dreamt up on the spur of the moment, perhaps? There are few strategies that will mitigate covering 600 acres of farmland in tarmac. As the EU says, the best mitigation is not to do anything so unsustainable in the first place.

iii) Heritage assets:

[Draft Local Plan, p158: "particularly respect the setting of heritage assets, especially All Saints Church... (see Policy EN 7: Heritage Assets)]

I'm not the only one who loves Tudeley Church: it is visited by many thousands of international tourists every year.

In just one six-week period between 20 August and 10 October, All Saints' visitors book reveals visitors from Denmark, Germany, France, Switzerland, Ireland, Australia, Georgia, Ecuador, South Africa, Belgium, Spain, Belarus, Netherlands, Canada, Japan, Gibraltar, Israel, Greece, Czech Republic, Italy, Norway, Egypt. **[Analysis of All Saints' Tudeley Visitors' Book - appended]**

The car park is routinely occupied by coaches of 30-50 seats or more. In the six months to 1 October 2019, the church calendar shows 84 visiting groups (defined as being 8 or more people). If the average group consisted of just 40 people, that is 2,000 visitors a year. **[www.tudeley.org/dailycalendar.htm]**

Of course, the vast majority of visitors come independently. Between April and October, 66 pages of the visitors' book were filled. Each page has 21 lines, giving at least another 1,000 visitors.

[Visitors Book, All Saints' Tudeley]

How many did not bother to sign? Twenty minutes spent in the church reveal that only a tiny minority do so. The total number of visitors per year is certainly in excess of 10,000.

Many stay in the area, and even more use local restaurants and pubs: they generate significant income for the area.

[ITN News, interview with Aline Koehler-Price, Poacher & Partridge, Tudeley, July 9, 2019]

All Saints' location is part of the attraction. A world-famous artwork in the middle of fields and woods is a significant draw. A world-famous artwork in the middle of a housing estate? Not so much.

According to Visit Kent, tourism's total value to the local economy has risen to £278 million a year. Is it really wise for Tunbridge Wells to jeopardise All Saints' contribution to that?

[www.timeslocalnews.co.uk, 17th January 2019]

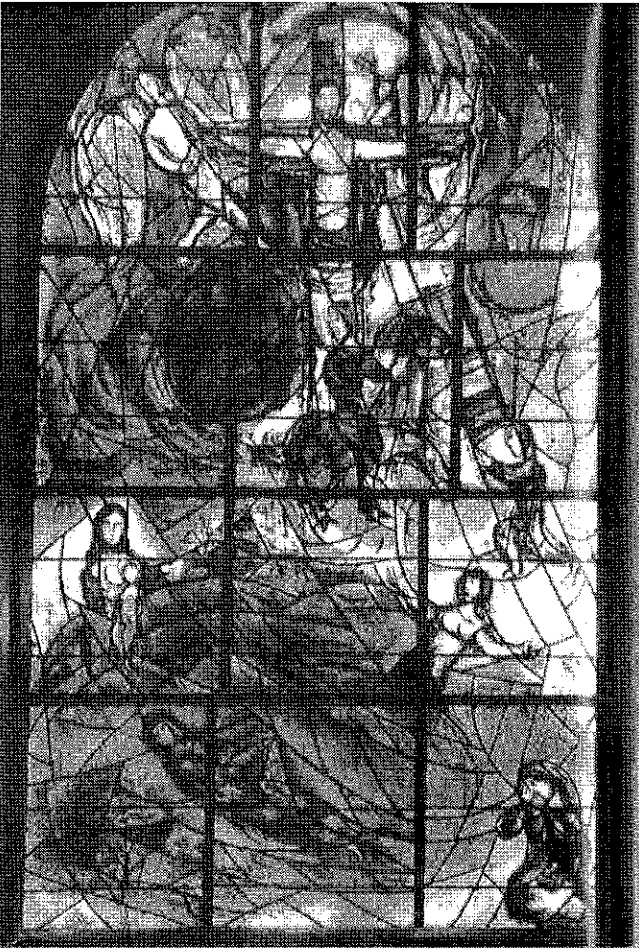
So far we have looked only at numbers.

Artistically speaking, how important is it really?

According to Simon Jenkins' 'England's Thousand Best Churches' it's "a superb work of 20th century church art"; Jenkins' book waxes lyrical, and devotes a whole page colour illustration to the east window.

under the tower. (This is what should happen with all bad Victorian glass.)

The glass at Tudeley is a superb work of 20th-century church art, ranking with Stanley Spencer's murals at Burghclere (Hants). The church is small and, with every one of its windows radiating deep blues and yellows, the visitor is submerged in Chagall's water world. The theme is set by the east window, in which a young girl floats in the trough of a wave.



TUDELEY
off page 22
Chagall glass

...with the daughter of the Duke and Duchess of Devonshire, was involved in a serious accident near Brighton. The girl's father (and the architect) commissioned the Russian artist, Marc Chagall, to design a new east window for their best church in memory of their daughter. The church is a modest structure, rebuilt in the early 1920s and with a vestry added in 1927. The east window was installed in 1927 and was so admired that more windows for the entire church were commissioned. Seven arrived in 1927 and the final four in 1929, the year of Chagall's death. The glass was made and fixed by Charles Ming of Kilmers, a modern collaboration so successful in fact between John Piper and Patrick Reynolds. The remaining Victorian windows are not displayed under the tower. (This is what should happen with all bad Victorian glass.)

The glass at Tudeley is a superb work of 20th-century church art, ranking with Stanley Spencer's murals at Burghclere (Hants). The church is small and, with every one of its windows radiating deep blues and yellows, the visitor is submerged in Chagall's water world. The theme is set by the east window, in which a young girl floats in the trough of a wave. Beside are a grieving family. Above are a housewife and a messenger mounting the ladder to Heaven. Three Christ figures look down from the cross, portrayed as what the guide calls 'the radiant and personable young man in whose company young people delight'. The bible is unrecognisable but not illegible.

The windows in the south wall of the nave are not blue but yellow to receive the rays of the sun on this side of the church. These 'glorious golden lines... radiate joy and hope for mankind and the promise of life eternal'. In fact Tudeley opens in the depth of winter added in my delight in discovering it, unappreciated, on the outskirts of Cambridge.

Chagall's east window at Tudeley

TUNBRIDGE WELLS
page 2 under the tower 22
Restoration started in style of Wells

Tunbridge Wells was in the Restoration until what happened was to the Regency. The wells were in support of Tunbridge Free under 1859 and had no place of Anglican worship until 1878, when a subscription was raised for a new chapel. The sponsors' list included the three Queens and the future Queen Anne, as well as Gloucester, Rochester, Peppin, Eschen and a heap of dukes and earls. The site might be ancient, reported in at the end of the Parishes, but the best photographs were removed from Wells's workshops in London. The dedication was in the High Church mood of the day, to King Charles the Martyr.

Today the chapel is almost invisible amid the passing traffic, but this adds to its quiet urbanity. A small tower and cupola poke up above the old roofs of the Parishes. Sweep gables mark the roof ends and classical doorways dress a redbrick facade of round-arched windows. We might be in Bruges, with some hints of water.

The chapel is as built except for a Victorian chancel inserted by Frank Gimson in 1882. The interior is serene and gracious, much closer in atmosphere to a Venetian hall church than an Anglo-Catholic shrine to a martyred king. Indeed, the altar was originally tucked away under the north gable. The plan is a spacious square, bisected by two Ionic columns of oak clad in plaster. These were inserted when an octagonal chapel being doubled in width to form the present square. The galleries survive except in the east, as do benches with beautifully carved ends. This contrasts unconvincingly with Christian's flawed, a frigid composition of Venetian arch and classical stained glass window.

Above stretches the glorious ceiling, mostly the work of John Webb and Henry Duggood over the period 1682-86. It has a wealth of delightful sunburst domes, and naturalistic plasterwork in the masses of Gimson

The overall objective of the Local Plan is “to ensure the quality of life for all residents whether in the home, at school, at work, or at leisure in 2033 is better than today”.

[TWBC Consultation Statement Sep 2019]

And in section 4.24 the plan notes that ‘the cultural offer of an area can benefit wellbeing... the borough has a cultural need’. [Draft Local Plan, section 4.24, p36]

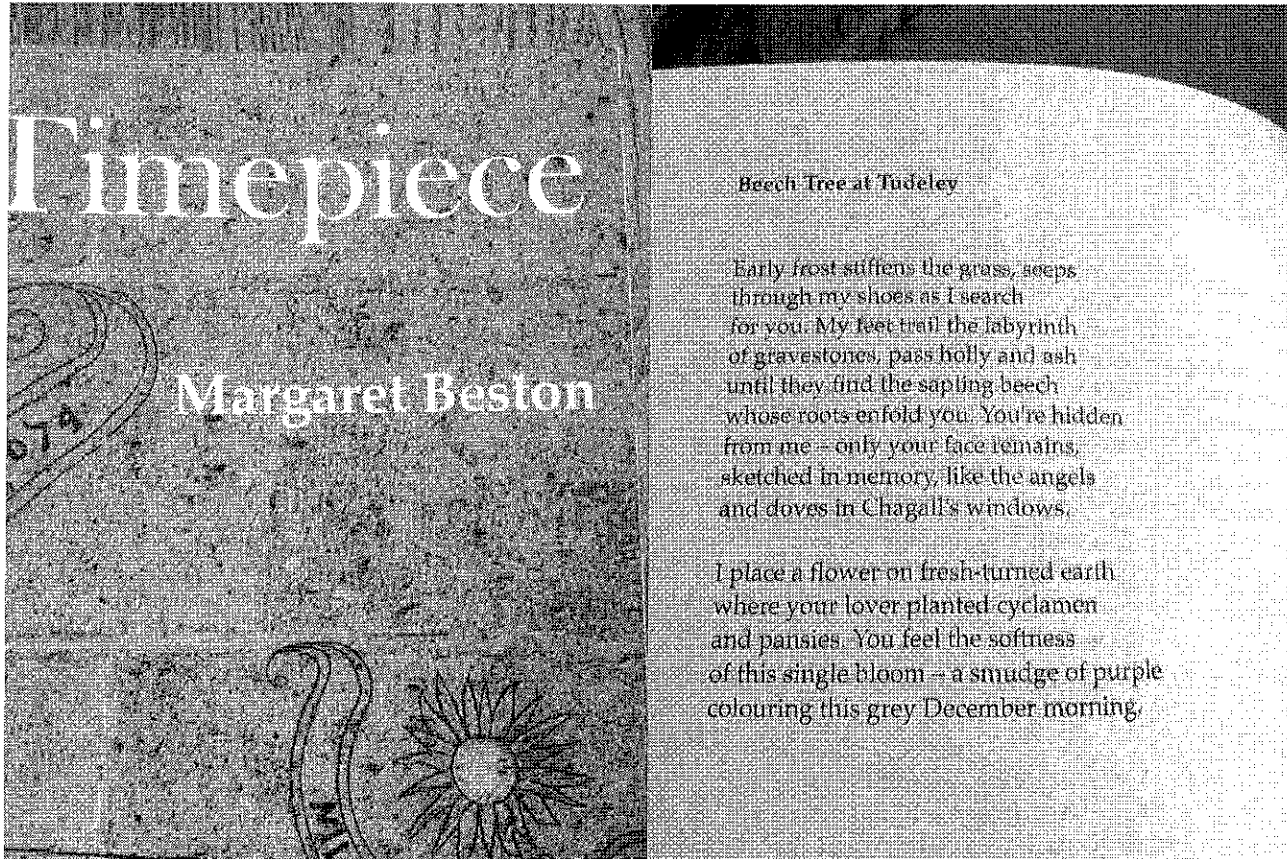
How can we calculate well-being? With mental health very much on today’s agenda, what recourse do people find in Tudeley?

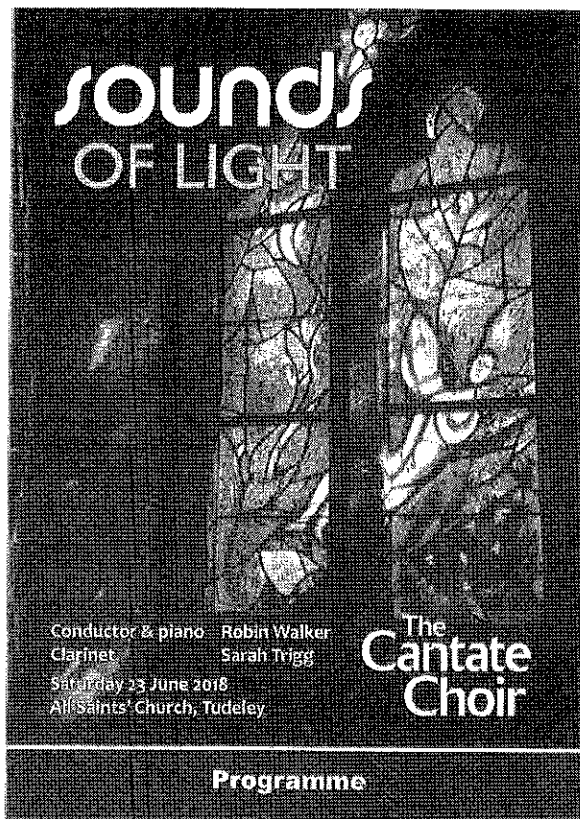
If the comments are anything to go by, visiting this country church in its quiet location has a transformative effect on many who come. Here are just a few comments from the visitors’ book:

- ‘A magical and spiritual place’
- ‘There is so much peace here’
- ‘Beautiful windows in a peaceful setting’
- ‘Meditative and beautiful’
- ‘Silence is golden’
- ‘So tranquil’

How much of this peace will visitors find if there is a housing estate all around the plot?

Meantime, the church provides inspiration for further artistic endeavour. Poetry and music have been generated by its presence and value:





sounds OF LIGHT

Musical Director Robin Walker
Clarinet Sarah Trigg

Welcome to All Saints' Church, Tudeley for Cantate's last concert of the season. It is privilege for us to be performing in such a beautiful setting, surrounded by 12 magnificent windows by Russian artist Marc Chagall.

The east window was commissioned as a memorial tribute to Sarah, the daughter of Sir Henry and Lady d'Avigdor-Goldsmid, who lived at the nearby house of Somerhill. Sarah drowned, aged just 21, in a sailing accident off the Sussex coast. Chagall was at first reluctant to take on the commission, but was eventually persuaded, and created the east window before visiting Tudeley. Upon seeing the church, at the dedication of the window in 1967, he declared "it's magnificent! I will do them all." The other eleven windows were designed over the following 10 years and installed just before Chagall's death in 1985.

Tonight's programme includes the first performances of two works inspired by Tudeley's windows, and unaccompanied choral works by English and French composers from the 16th to 21st centuries. Hopefully you are reading this on a beautiful midsummer's evening, and can enjoy the windows in the evening light as you listen.

From Oxford University, one commentator speaks of the experience of sitting in "that still, small church, immersed in the colour and pain and hope of those windows shining through".
[www.universitychurch.ox.ac.uk/sermons/chagall-tudeley]

Note the mention of stillness. Surround this gem with houses, and that is what will be lost.

The best way to 'respect the setting of... All Saints' Church' is NOT to build 2,800 houses around it.

iv) **Transport:**

Perhaps the most compelling argument against the Local Plan for Tudeley is in the matter of transport. It has been pointed out that the traffic from the new development would inevitably devolve on Tonbridge and its railway station. As neighbouring MP Tom Tugendhat points out, this station is already the busiest in Kent - and - other than London - one of the busiest in the south-east of England.

20 NEWS Weekly Comment FOR EVEN MORE NEWS VISIT: timeslocalnews.co.uk



Tom Tugendhat

MP for Tonbridge & Malling

Tom Tugendhat served on operations for the Olympics to the Foreign Office and selected Chair of

I am ready to fight for what our

SOMETIMES it feels like we do nothing but talk about politics these days. With national elections, referendums, local votes and more in the past few years becoming so frequent, it is worth remembering what politics is for – delivering the best for our community.

That's why I'm going to be asking for your support again when we next go to the polls.

We have become a static Parliament, paralysed for too long. We need a new mandate from you – the people I work for – to deliver the policies we

is already under strain, and many people in Tonbridge are objecting to the proposed development at Tudeley because of the extra pressure that would put on our area.

We have had successes, though. The A21 dual carriageway to Pembury, and the campaigns we have led together campaigning for better bus routes so that our children can get to school safely, mean that everyone can get around more easily. That's important for all of us, but there is more to do.

RUSH HOUR
Tonbridge is now the busiest station in the South East outside London

There is little or no prospect of a new railway station to serve the new community. Simply put, the transport links do not exist.




TWBC realise this - but they have a plan:

“Technology in transport is moving rapidly, including in relation to autonomous vehicles... scope for new and innovative technology.”

[Draft Local Plan para 4.61]

Early drafts of the plan recommended autonomous vehicles connecting Paddock Wood, Tudeley and Tonbridge; these futuristic recommendations have been tactfully dropped in the published version.

But TWBC has a record for embracing this innovative thinking, though so far only in theory. An imaginative and visionary proposal was put forward as far back as 2016 - though its proponent had been working on it for some four years prior to that.



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Self-driving cars could be introduced in Tunbridge Wells

[KENT TRAVEL NEWS](#) [SIGN ME UP FOR NEWS ALERTS](#)

By Annabel Rusbridge-Thomas arusbridge-thomas@thekmgroup.co.uk

Published: 12:00, 10 March 2016



Self-driving cars could arrive on the streets of Tunbridge Wells as the local authority considers investing £30 million in the emerging technology.

Tunbridge Wells Borough Council (TWBC) is discussing the potential use of driverless vehicles to address congestion in town.

Traditional park and ride systems have previously been rejected on the grounds of cost, feasibility and impact on main roads.

'Self-driving cars could be introduced in Tunbridge Wells'

[www.kentonline.co.uk/tunbridge-wells/news/kent-town-set-for-30m-92396]

Self-driving Vehicles for Tunbridge Wells.

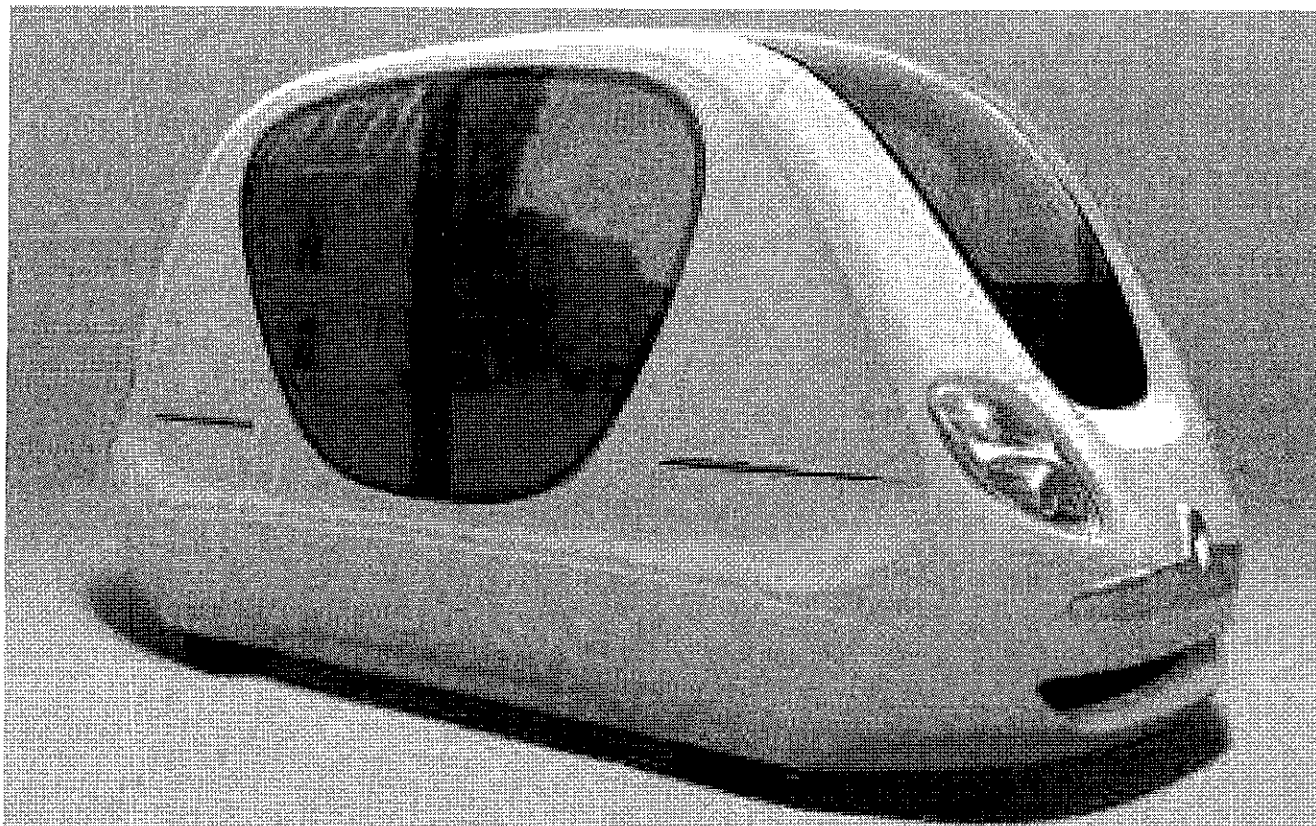
Joint Transportation Board Agenda and minutes, Monday, 15th February, 2016

[<https://democracy.tunbridgewells.gov.uk/meetings/documents/s26066/15b%20Self-driving%20Vehicles%20for%20Tunbridge%20Wells%20-%20Appendix%20B%20-%20Background%20Papers.pdf>]

As of 2019, this attractive and compelling £30million project still exists only on paper. It seems highly probable that the same fate would befall the Tudeley version.

TWBC has a standard response to all insoluble problems: future technology will provide. These tech solutions are as-yet uninvented, and/or impractical.

—
In parenthesis, I don't expect many people in Tunbridge Wells have ever seen a podcar, or even a picture, so here is one. We look forward to seeing them in Tudeley. [www.podcars.com]



Alternatively, the 'Mister' model seems particularly well-suited to rural Kent:



There may also be scope for a development of this kind - perhaps sited mid-Medway? *



** After flooding, obviously.*

5. Climate change and the environment

TWBC Objective: 'to tackle climate change'

[Draft Local Plan, p32, Vision and Objectives 2, Strategic Objectives #7: "tackle climate change and minimise the impact of development on communities..."]

On 1st May Parliament passed a motion declaring a climate emergency. Just when we need to treasure our green spaces more than ever, it's short-sighted indeed to be considering submerging Green Belt, AONB, and ancient woodland under yet more development.

However environmentally friendly a development may be, its carbon footprint will be huge: every cubic yard of concrete is responsible for emitting around 400 lbs of CO².

[World Business Council for Sustainable Development]

And the more we pave the Medway valley, the more flooding there will be - TWBC's 'mitigations' notwithstanding. The water has to go somewhere.

We now know that climate change is happening far faster than was previously thought *[Scientific American August 19, 2019]*; the UK Met Office now confirms that after 11,000 years of stable global temperatures, there has been a rapid heating in the last twenty years.

 Met Office

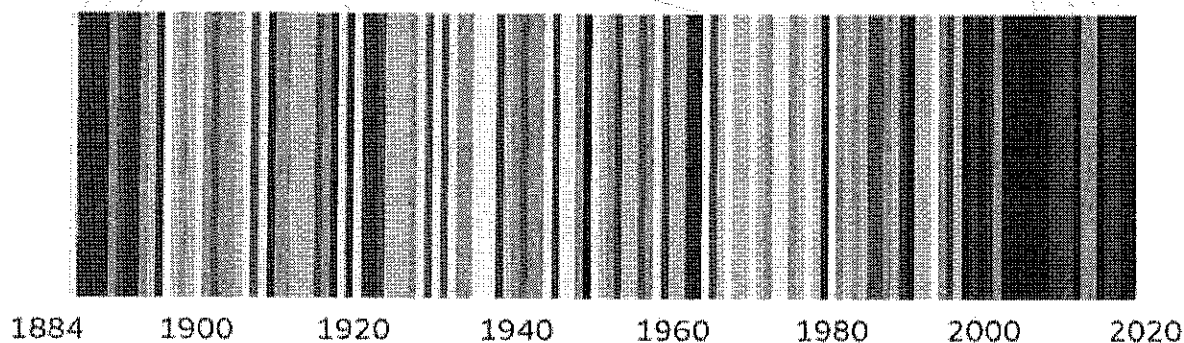
UK annual temperature

5 coolest years

1892, 1888, 1885, 1963, 1919

5 warmest years

2014, 2006, 2011, 2007, 2017



The UK has a responsibility be at the forefront of change: as the first to industrialise, it has cumulatively contributed more carbon dioxide emissions than most other countries.

[Myles Allen, Professor of Geosystem Science, University of Oxford]

The latest reports came in August 2019; the draft Local Plan does not - and could not - take account of them. In the light of new research this development is clearly far from sustainable.

The Tudeley project represents the thinking of the past, when we thought we could just take from the planet and give nothing back. We know better now.

5. Can TWBC deliver?

i) A history of failure

It's cruel to mock the afflicted, but it must be admitted that TWBC's history on delivering on its projects is not an encouraging one. The election of councillors from outside the old TWBC clique seems to augur well for the future, but there is a long way to go.

Here is what locals call 'the cinema site'. It faces directly onto TWBC's council offices.



To the frustration of residents, it has presented this appearance for eighteen (yes - 18!) years.

Residents were incredulous that in eighteen years, TWBC was unable to manage this prime site in such a way that it was anything other than an eyesore.

The previous structures were demolished in 2001. According to the local newspaper, diggers were finally spotted just last month.

Work finally gets underway on the derelict cinema site

16th October 2019

PREPARATORY work has begun on the former ABC cinema site at the top of Mount Pleasant Road, 18 years after it was left derelict.

The lack of activity on the site has been a bone of contention in the town since the cinema was closed and eventually pulled down in 2001.

For nearly two decades, various developers have taken possession of the land, only to subsequently sell it on.

Elysian Residences took ownership of the 1.3 acre parcel of land last year, after previous developers Altitude pulled out of building a mixed use retail and residential complex.

Last month, the company had their plans to turn the site into a mix of 108 retirement apartments, retail units, a restaurant and boutique cinema, approved by the Council's planning committee.

A digger and Portacabin were spotted last week behind the hoardings on the site, as work began to clear the ground ready for building work to begin on the £80million 'Belvedere' at the end of the year.

[www.timeslocalnews.co.uk/tunbridge-wells-news/work-finally-gets-underway-on-the-derelict-cinema-site]

But note that the plan includes a mix of units, to include retail outlets.

Once upon a time, retail could be depended upon to provide an income from any town development; those days are gone. In Tunbridge Wells' main retail centre, Royal Victoria Place, a third of the shops stand empty.

[www.kentlive.news/news/kent-news/nearly-third-royal-victoria-places-1032472]

There is no plan to convert any retail premises to dwellings. (Why not?) Instead, TWBC plans for yet more unsustainable retail outlets. Yet again, TWBC is living in the past.

Next, it turned out that their flagship project for new council offices and theatre was deeply unpopular with residents. Voters turfed out long-established councillors in favour of a single-issue party, the Tunbridge Wells Alliance. After years of planning and expenditure in excess of £10million, the project - known around the borough as 'The Vanity Project' - was finally quashed on October 8 2019.



Lucy Willis
Speldhurst &
Bidborough



Becki Bruneau
Park



Nicholas Pope
Park



Christian Atwood
Park



David Hayward
Pembury



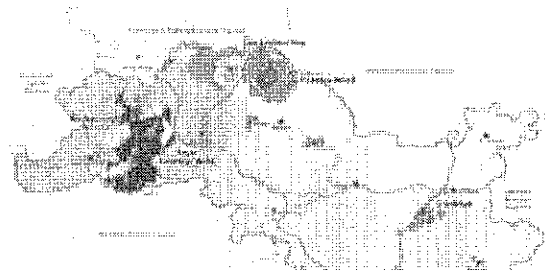
Nancy Warne
Benenden &
Cranbrook

Victory for Tunbridge Wells Alliance

Tunbridge Wells Alliance have led the campaign to stop the increasingly costly Calverley Square scheme since 2017.

Working with councillors from the other parties, the Calverley Square project was stopped on 8

Local Plan consultation extended



At once, TWBC created more problems with its grandiosely-named and similarly costly Public Realm plan, costing £1.3million and driving Monson Road retailers close to bankruptcy. The works started on July 7 2019 and were supposed to finish on September 1, but had not been completed by October 30.

[www.timeslocalnews.co.uk/tunbridge-wells-news/ten-sets-of-roadworks-on-same-day-bring-the-town-to-a-standstill]

As late as 1 October, local journalist Mary Harris began a social media campaign to save local shops: "What Monson News has on the shelves is all they can afford now to put on there..."



Mary Harris
@maryharris16

Just spent more than an hour talking to the owners of two businesses in Monson Road. It's getting to crisis point. I am asking you, tomorrow, the next day or the next day - please go and buy something from Monson News. I will. And also, if you can, book a meal at La Follia, the..



5:32 pm · 1 Oct 2019 · Twitter Web App

21 Retweets 29 Likes



Mary Harris @maryharris16 · 1 Oct

Replying to @maryharris16
Italian restaurant. If even 100 of you do this, today or tomorrow, or the next day, you could make the difference to them surviving. This is not a gimmick. This is the ONLY way Monson News is going to survive. I asked them permission to do this. They said ANYTHING will help. And

3 Retweets 9 Likes 17 Likes

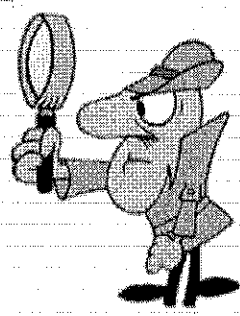
Mary Harris @maryharris16 · 1 Oct

La Follia needs customers coming through the doors, ringing for bookings. Go for a pasta at lunch, take your friend in the evening. Please can you do this? If you go to Monson News or La Follia please send me a picture on Twitter and I will retweet. Can we help as a community?

5 Retweets 11 Likes 26 Likes

The draft local plan has already cost over £574,000 and is on track to be 2 years and 2 months behind schedule. And yet it has been rushed through.

Month	Amount	Company	Page
May 2019	£6,999.00	Jeremy Benn Associates Ltd	Page 3
	£49,084.00	Sweep UK Ltd	
	£6,866.80	PUBLIC INTEREST PLANNING LIMITED	
	£1,500.00	Jeremy Benn Associates Ltd	
June 2019	£652.50	Jeremy Benn Associates Ltd	
	£23,411.00	CURRIE AND BROWN UK LTD	
	£5,562.65	PUBLIC INTEREST PLANNING LIMITED	
	£2,020.15	This data has been redacted under the Data Protection Act	
	£11,234.00	AECOM INFRASTRUCTURE & ENVIRONMENT UK LTD	
July 2019	£49,271.00	Sweep UK Ltd	
	£4,068.75	Dixon Searle Partnership Ltd	
	£5,110.00	PUBLIC INTEREST PLANNING LIMITED	
August 2019	£500.00	Jeremy Benn Associates Ltd	
	£7,886.00	Public Interest Planning Limited	
	£6,858.00	Aecom Infrastructure & Environment Uk Ltd	
September 2019	£990.00	Natural England	
	£8,990.00	Sweep Uk Ltd	
	£396.00	Cliffe Enterprise	
	£5,730.48	Public Interest Planning Limited	
draft v.15 27 Oct 2019		£4,568.76 £600.00	
		Dixon Searle Partnership Ltd	
		One Media And Creative Uk Ltd	
	Total (So Far)	£574,007.43	



© Twellsense

Data extracted from 'Payments Over £250' reports on TWBC website.

[@twellsense analysis, via Twitter]

TWBC's plan offers 'a vibrant and viable town centre'. [4. 5.9]

The Council has "ambitious plans to improve the offer of the town centre with both public and private sector investment, including the Calverley Square project providing a new modern theatre...".

Vibrant and viable? The Calverley Square project is cancelled. The local retail centre is on its last legs. The council's grandiose plans are bringing retailers to their knees.

Do these experiences encourage us to believe that TWBC is competent to manage the Tudeley project, in partnership with a landowner who gives his job title as 'farmer'?

Or do they indicate another expensive omnishambles?

ii) A failure to consult

TWBC's draft Local Plan looks to the future - and it's rosy:

"A new garden settlement will have been established at Tudeley Village, including homes, employment, and community facilities: this will continue to develop into the following years. It will be well connected to other settlements..."

[Vision and Objectives, 3.2, 1, page 21]

Which 'other settlements' are these, and how will they be connected?

The only meaningful one is nearby Tonbridge which has its own housing need. The Tudeley development is located absolutely on TWBC's border with Tonbridge and Malling. It is 1.5 miles from Tonbridge Railway Station, and the best part of 6 miles from Tunbridge Wells Station.

It is clear that all the infrastructure demand will be placed on Tonbridge.

The Local Plan developed for nearby Sevenoaks was recently rejected by inspector Karen Baker for not properly consulting neighbouring authorities, saying:

"My main concern relates to the lack of constructive engagement with neighbouring authorities to resolve the issue of unmet housing need and the absence of strategic cross boundary planning to examine how the identified needs could be accommodated. Indeed, the council did not formally ask neighbouring authorities if they were in a position to address its unmet housing need until just before the Local Plan was submitted for examination.

Any failure of the duty to co-operate cannot be rectified during the examination and therefore the only option is for a report recommending non-adoption to be issued or for the plan to be withdrawn."

So how have nearby TWBC handled their duty to co-operate? The headlines are not encouraging.

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Tonbridge and Malling Borough Council blasts Tunbridge Wells Local Plan including Capel, Tudeley Village

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By Lydia Chantler-Hicks ichantlerhicks@thekmgroup.co.uk [Read all comments | 6](#)

Published: 15:44, 19 October 2019 | Updated: 13:21, 22 October 2019

[f](#) [t](#) [r](#) [p](#) [g](#) [in](#) [e](#)

Council chiefs have blasted plans to build almost 7,000 homes in a neighbouring borough.

Tonbridge and Malling Borough Council (TMBC) has raised concerns over proposals for several major developments drawn up by Tunbridge Wells Borough Council (TWBC) as part of its draft Local Plan.

[www.kentonline.co.uk/tonbridge/news/council-blasts-plans-for-thousands-of-new-homes-214496]

Neighbouring Tonbridge and Malling Borough Council knew nothing of the Tudeley plan. When it was revealed in full, T&MBC went so far as to hold a special meeting to discuss it (2 Oct 2019), at which Tonbridge and Malling's mayor said: **"I am so angry I can hardly speak"**.

In his response letter on behalf of T&MBC, Planning Policy Manager Ian Bailey wrote: **“TMBC needs to be assured that it will be a key partner”**.

[Response on behalf of Tonbridge and Malling Borough Council (T&MBC) 16.10.2019]

TWBC replied blandly that “The policies specifically state that we will work closely with neighbouring authorities on the infrastructure requirements of the Plan.” The inspector may consider this to be a little late in the day, and wonder why it is limited only to infrastructure requirements?

As for residents, the full proposal for Tudeley was only publicly revealed in May 2019:

13.03.18 Presentation by TWBC to Parish Chairs. This did not raise the possibility of a New Town in Capel; instead it proposed 440 new homes in Five Oak Green. Three potential “garden village” sites were shortlisted for feasibility studies... Tudeley was not one of them.
20.04.18 Meeting with TWBC to discuss housing allocations. The possibility of Tudeley New Town was first raised.
16.08.18 Meeting between Capel Parish Council and TWBC, at which TWBC sought written confidentiality obligations. A brochure entitled “Hadlow Garden Village”, prepared by the landowner, was provided.
19.05.19 At Capel Parish Council’s insistence, TWBC announced in public for the first time the intention to develop: • 2,500 - 2,800 homes on site CA1 (Tudeley) • 4,000 homes around Paddock Wood, including 1,400+ in East Capel

[Excerpt from letter from Castle Planning of Berkhamsted, Herts, dated 31st July 2019, on behalf of The Save Capel Campaign Group and Capel Parish Council]

Other aspects of the plan were developed years earlier, and indeed, the plan itself was due for publication in January 2019. Was it delayed until May to work up some justification for the so-recently-included plan for Tudeley? Or were the plans kept quiet for as long as possible because TWBC knew they were flawed?

For consistency of approach, the Inspectorate must surely return the plan to TWBC for ‘lack of constructive engagement’.

iii) Evidence base impossible in the time

Section 1.30 of the plan states that TWBC has “commissioned and completed a substantial and varied evidence base” **[Draft Local Plan, 1.30, p19]**

Yet the Tunbridge Wells Green Belt Study, Stage Two, prepared by LUC in July 2017, makes no mention of the Tudeley project - though other parcels are examined in detail. Was Tudeley not included in TWBC’s plans at that time?

How can ‘a substantial and varied’ evidence base have been constructed between publication of the Green Belt Study in July 2017 and the first mention of the scheme in April 2018?

Certainly very little time has been allowed to build up “a substantial and varied evidence base”. How could such an evidence base be comprehensive without the views of residents? How could those views have been incorporated when the plan became public only in May 2019?

One might conclude that the various arguments in favour of the Tudeley project have been hastily put together to justify, ex post facto, its inclusion in the Draft Local Plan. This view is supported by the failure to consult with neighbouring boroughs: presumably TWBC simply didn't have time to comply with this aspect of the Local Plan system.

iv) Non-compliance with NPPF

Does the plan comply with the Local Plan system in other respects? According to the **NPPF Consultation Draft** p18, it is required to be:

“Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.”

- There has been **no objective assessment** of the area’s housing need
- Plan was **not** agreed with neighbouring councils eg Tonbridge and Malling
- Does not balance needs, so is **not** consistent with sustainable development*

** The term ‘sustainable development’ is long defined as “development that looks to balance different, and often competing, needs against an awareness of the environmental, social and economic limitations we face as a society” Sustainable Development Commission, 2011*

“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”

- Reasonable alternatives (eg brownfield) have **not** been considered
- The attraction of dealing with **just one-landowner** has overridden other concerns
- **No proportionate evidence** of alternatives: they have simply been ignored

“Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground”

- Not based on cross-boundary working with T&MBC - and others?

“Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

- Not consistent with recent ministerial pronouncements on Green Belt
(See also notes on sustainable development above)

In conclusion, it is clear that TWBC’s Strategy for Capel Parish fails on many counts. It has failed to follow proper NPPF procedures in consulting with neighbouring boroughs, with calculating its housing need, or taking account of environmental factors.

It dismisses the causes of the national housing crisis without consideration. It proposes a ghetto for the wealthy. It fails to address its own housing need - 1,000 families waiting for housing.

It proudly boasts its plans for affordable homes, conveniently overlooking the fact that they will be affordable only to those with incomes over £100,000.

It is out of date with respect to environmental challenges. It pays insufficient attention to the risks of flooding, promising unspecified mitigations. Without justification, it places a huge percentage of its planned housing entirely on the one fifth of its area which is designated Green Belt. It fails to focus on the 25% of its area which is NOT Green Belt, AONB or SSSI.

TWBC's plan would utterly ruin its biggest heritage asset - the quiet peace of a country churchyard, and a mecca for visitors from far and near, thereby jeopardising its own tourism income.

It offers futuristic but unspecified solutions to its transport problems, dumping them unannounced on its neighbouring borough, whose railway station is already the busiest in south-east England.

It claims to be concerned about climate change, but offers more unspecified and probably non-existent mitigations.

It exaggerates the value of its evidence base, and seeks to divert attention from the rushed manner in which its plan for Tudeley has been developed.

It has a record of proposing unworkable plans, spending millions of pounds of ratepayers' money on them, and having them collapse. Residents opine that it is not competent to manage its own parking policy, let alone a major housebuilding project.

It is, in short, a failure.

**TWBC's response to the government's call for
'the right homes in the right places' is to come up with
the wrong homes in the wrong places.**