

Tunbridge Wells Borough



Tunbridge Wells Borough Council

**Strategic Housing and  
Economic Land Available  
Assessment: Sustainability  
Appraisal Reasonable  
Alternatives**

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January 2024

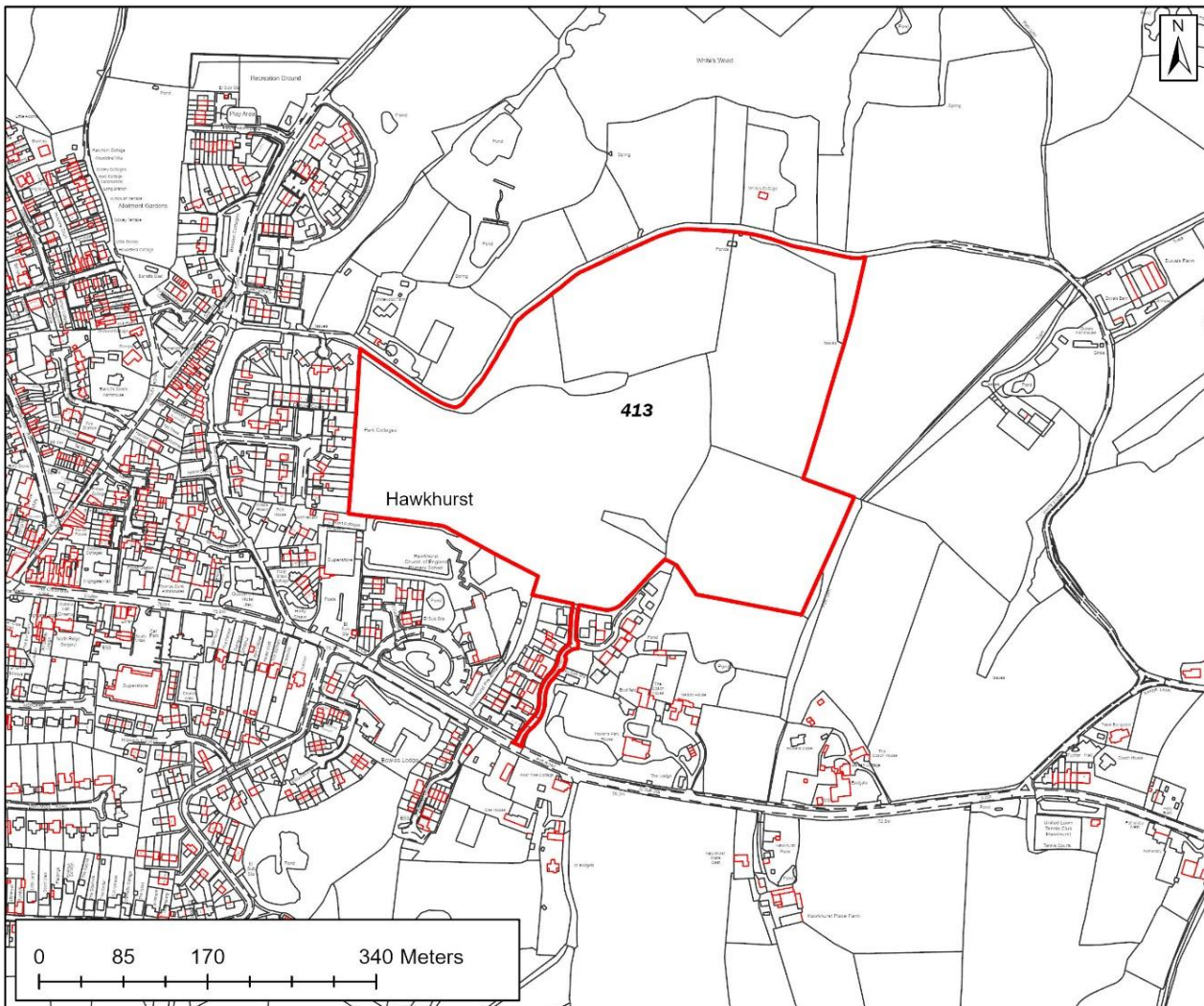


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# Site Reference: 413 (Amended New Local Plan Allocation AL/HA 5)

**Site Address: Land to the north of Birchfield Grove, Hawkhurst**



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Map Dated: September 2023

<b>Parish:</b>	Hawkhurst
<b>Settlement:</b>	Hawkhurst
<b>Gross area (ha):</b>	13.91 ha
<b>Developable area (ha):</b>	11.56 ha
<b>Site type:</b>	Greenfield site adjacent to LBD
<b>Potential site use:</b>	Site has been assessed for development potential, notably for a mix including residential use, education use, medical facility/ community use
<b>Potential yield if residential:</b>	70
<b>Issues to consider:</b>	Ecology: TPO, Ancient Woodland; AONB Component Part: Ancient Woodland, Historic Settlements, Water Courses, Ponds, Historic Field Boundaries; AONB;

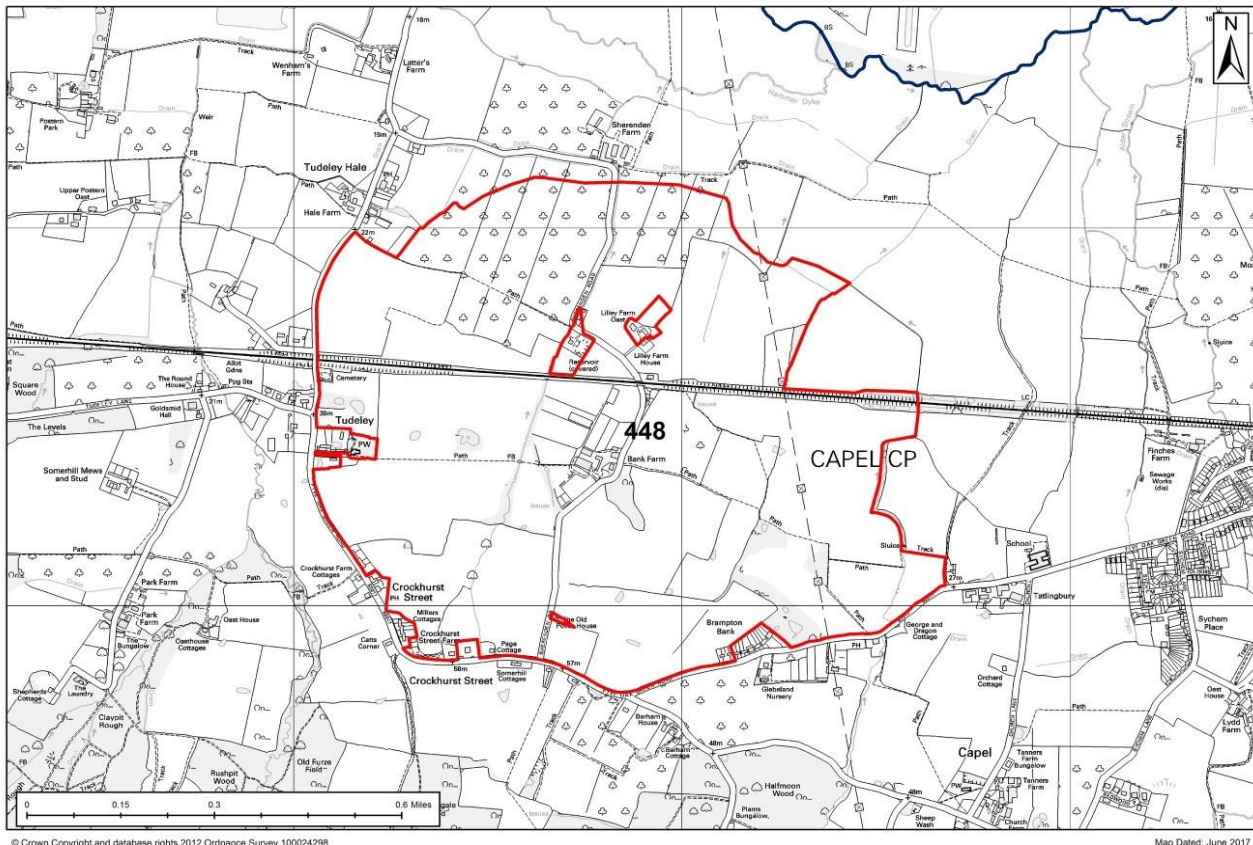
	<p>HLC Period: Early modern, Early 20th century;  Contaminated Land (depot / dispensing of automotive vehicles);  APA: General background archaeological potential;  ALC: GRADE 3;  LCA: Wooded Farmland;  Heritage – Conservation Area and Listed Building settings;  Potential highway matters;  Adjacent to LBD</p>
<p><b>Site Description:</b></p>	<p>The site is a green field with currently some sheep grazing. There are no existing buildings on the site. The site is adjoined by residential properties, a Tesco superstore, fields, woodland and a school. The site boundary comprises a woodland edge along Whites Lane. Other boundaries comprise hedging and some domestic boundary treatments. There are trees within the site, including some veteran trees.</p> <p>The site contains a small parcel of ancient woodland to the north, but this is excluded from any potential developable area.</p> <p>Vehicular access can be provided from the site onto the Rye Road via Birchfield Grove. Pedestrian access from the site to the services provided at Hawkhurst is via Birchfield Grove that then links up with the Rye Road.</p> <p>There is also vehicular access into the site off Whites Lane, which is rural in character, where there is a metal field gate on a bend. Whites Lane is narrow, one car width with few passing places. There is a lack of pavements along Whites Lane. A PRoW (WC 187) runs close to the eastern boundary of the site.</p> <p>The topography of the site undulates. There is a public view of the site from Whites Lane, which is an open view from the gate. Views into the site are more screened by trees along Whites Lane. There are some clearer views of the site from the residential properties along the western boundary, and from Birchfield Grove to the south.</p>
<p><b>Suitability:</b></p>	<p>The site is adjacent to the LBD and is in proximity to the centre of Hawkhurst. The site is likely to be sustainable in this context.</p> <p>The site has previously been found suitable in part, and in the Submission Local Plan, part of the site is allocated to provide a new medical centre and associated parking (Submission Local Plan Policy HA5). The draft policy does not include any residential development on the site.</p> <p>The Inspector’s initial findings about the allocation determined that the allocation is undeliverable (due to land availability without associated residential development on the site) and the allocation ineffective in its current form. As such consideration has been given as to how the medical centre could be provided, with regard also to an associated planning application currently before the Council which seeks consent for the medical centre, up to 70 dwellings and safeguarded land for future educational use (planning application reference 22/02664/Outline).</p> <p>It is considered that there are no other suitable or available sites on which to provide the new medical centre and that development</p>

	<p>as part of a mixed-use scheme, including some residential use and safeguarded land for future education use associated (as per the current planning application) would ensure deliverability of the medical centre and ensure that a revised allocation policy for the site is effective, overcoming the Inspectors initial findings. Such uses will help meet identified needs.</p> <p>It is acknowledged that the previous (SHELAA prepared for the Pre-Submission Local Plan) assessment of the site found part of the site unsuitable for potential allocation due to impact on the High Weald AONB landscape, impact on setting of the settlement, and in conjunction with highway capacity. However, the Council's consideration of the planning application is a material change in circumstance, which is given significant weight in this revised site assessment, and as such the site is now considered suitable for development of the type set out above.</p>
<b>Availability:</b>	Available Single ownership
<b>Achievability:</b>	This site is available and is suitable. It is considered that this site could be delivered in the Local Plan period.
<b>Sustainability Assessment:</b>	This site provides a reasonably significant quantity of new dwellings. The sensitive edge of settlement location with far reaching views is likely to cause impacts upon the character of the AONB and the wider historic environment (confirmed by the 2020 LVIA report). The relatively large number of dwellings may impact upon the recently declared AQMA. Scores for equality, air, travel and services reflect expectation that <del>direct</del> pedestrian routes to services on <del>would be made onto</del> Rye Road <u>would be more attractive than travelling by private car</u> . The positive education score reflects the suitability of the site to safeguard land for expansion of the primary school.
<b>Conclusion:</b>	Site is suitable as a potential Local Plan allocation.
<b>Reason:</b>	Site lies adjacent to the LBD and there is pedestrian access to the centre of Hawkhurst. The site is likely to be sustainable in this context. The planning application reference 22/02664 is a significant material planning consideration in this latest assessment of the site.

# Site Reference: 448; Sustainability Appraisal: Capel (Sustainability Appraisal: Reasonable Alternative SS3 Revision A)

**Site Address: Land at Tudeley, Tudeley, Tonbridge**

Call for Sites 2017 Submission



<b>Parish:</b>	Capel
<b>Settlement:</b>	In proximity to Five Oak Green and Tonbridge
<b>Gross area (ha):</b>	170
<b>Developable area (ha):</b>	Subject to masterplanning
<b>Site type:</b>	Largely Greenfield land with some PDL in largely rural area in proximity to settlements of Five Oak Green and Tonbridge
<b>Potential site use:</b>	Site has been submitted as a potential new settlement. It would be a mixed-use scheme including residential use.
<b>Potential yield if residential:</b>	Approximately 2,800 overall, including c1,450 within the plan period. Subject to Masterplanning.
<b>Issues to consider:</b>	Heritage: Listed Buildings on and adjacent to site; Ecology: Ancient Woodland; Transport Infrastructure: PRoW; MGB; Flood Zone 2; Flood Zone 3; HLC Period: Early medieval, Early 20th century; APA: WWI Aircraft Crash site; ALC: GRADE 3, GRADE 2; LCA: Forested Plateau, Low Weald Farmland;

	<p>Land contamination (sewage treatment works, cemetery (Modern), railway land (tracks); Highway matters; Infrastructure; Cross boundary issues</p>
<p><b>Site Description:</b></p>	<p>The site comprises a mix of agricultural land including orchards, farm and pockets of residential uses. There are areas of woodland within the site. The site includes the main railway line and bridges. There are some commercial uses on the site as well as paddocks and stables. There are several existing buildings located within the site. The site is adjoined by residential uses, public houses, fields, a reservoir borehole, mews and stud and there is a school adjacent to the site as well. Site boundaries comprise a mix of trees, hedging and fencing.</p> <p>There are roads that run through the site, including Sherenden Road for example and several Public Rights of Way. Five Oak Green Road runs to the south of the site and has pavement. The site is flat in areas with localised level changes. There are public views of the site from roads and footpaths and long-range views in places.</p>
<p><b>Suitability:</b></p>	<p>Whilst the site (submitted as a new garden settlement) in its entirety with the full quantum of development (around 2,800) is suitable if Green Belt exceptional circumstances are met, there are concerns about the lower scale of growth that could occur in the plan period currently.</p> <p>This site is the same as the site proposed for allocation in the Submission Local Plan (SLP), by site allocation Policy SS3, but with the delivery of less dwellings within the plan-period (around 1,450 compared to around 2,100).</p> <p>The Scale of growth in the plan period is significantly reduced and as such there is concern because the site is currently separated from any main settlement with the provision of facilities and services. The site allocated in the SLP, is of a scale where a garden settlement can be masterplanned properly to create a sustainable settlement, as per key considerations for planning for new settlements/ significant extensions to existing settlements set out at para 73 of the NPPF. The scale of growth previously allocated enabled opportunities to create strong and permeable links within the site and to key nearby settlements.</p> <p>It is considered that this option, with reduced growth, would not enable the creation of a sustainable settlement in the plan period, and that there would be doubt about viability and deliverability given less growth to contribute towards required infrastructure.</p> <p>The site is outside but adjacent to the AONB: whilst regard must be had to the AONB setting (including impact on the AONB of the associated Five Oak Green Bypass), the policy constraints of this national designation do not apply to the land.</p> <p>The land is Green Belt, and the Green Belt Study Stage Three Assessment prepared by LUC for the Council (2020) identifies the harm resulting from the removal of this land from the Green Belt</p>

	<p>as high (moderate to high in the southwestern part of the site). There is national policy protection for the Green Belt, the NPPF recognises that Green Belt boundaries can be altered where there are exceptional circumstances, and these are fully evidenced and justified.</p> <p>Regarding the level of harm arising, it is acknowledged that the previous SHELAA assessment of the site, recognised that mitigation measures are identified in the Green Belt report which could help reduce the potential visual influence of development on Green Belt land, and that the masterplanning work could have regard to this. In addition, it was considered that there was scope for compensatory improvements to the Green Belt. This latest assessment recognises the Inspectors initial findings that the necessary exceptional circumstances for the release of the site from the Green Belt are not considered to have been demonstrated.</p> <p>Heritage is a key matter which needs addressing, especially regarding All Saints Church which is Grade I listed and lies to the west of the site. However, with a masterplanned approach to development it is considered the effects of the development on this, and other heritage assets could be properly explored.</p> <p>In re-assessing this site, regard has been had to the Inspector's <a href="#">initial findings</a> received November 2022. These raise significant concerns with the allocation of the site in respect of its location and accessibility, whether the necessary infrastructure can be provided and whether the site can be delivered in the manner envisaged.</p> <p>Having regard to this, and the Inspectors initial findings, it is considered that on balance the site is currently unsuitable for allocation.</p>
<b>Availability:</b>	Available Single ownership (excluding railway line)
<b>Achievability:</b>	<p>This site is available and is in single ownership. The deliverability of the site in the plan period is a concern, with a much-reduced delivery (circa 1,450 compared to the circa 2,100 units proposed in the Submission Local Plan) expected.</p> <p>The suitability box above identifies concern about whether the required Green Belt exceptional circumstances can be demonstrated, having regard to the Inspectors initial findings. Whilst at a high level, the concept of the garden settlement is achievable, at the current time, and for reasons explained in the suitability box, the site is not considered achievable.</p>
<b>Sustainability Assessment:</b>	Traffic would increase substantially and movement of vehicles into the AQMAs in Royal Tunbridge Wells and Tonbridge is highly likely. Conversely, master planning would ensure the new settlement is designed to discourage private car use with active and shared transport options given priority. This would bring large benefits. A mixed score for air quality is applied.



Biodiversity constraints such as designated sites are limited. Undesignated habitat such as hedgerows and ponds are likely to be impacted, although a strong commitment to net gains would lessen impacts in the long term.

Business scores positively, 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.

The climate change score reflects the increase in energy and fuel demands created by the 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.

New educational pressures are expected to be met by provision of new or extended schools and the later delivery of housing does not impact this. Adult education facilities are not considered, and it is expected that Royal Tunbridge Wells would continue to meet this demand. The site would benefit from new employment space and job creation, which would offset the loss of agricultural jobs from development on agricultural land.

Equality scores positively with access to facilities for those with impairments felt to be possible with a strong master planning approach.

The health objective scores well due to the provision of sports facilities that would help improve physical activity rates and the locality meeting 3 out of the 5 Accessible Natural Greenspace Standards. It was also felt likely that the proposals would include provision for elderly care services and improvements to accessible greenspace (as opposed to the existing greenspace which is largely privately owned).

The heritage score has been updated since Draft Local Plan stage to reflect additional assessment work carried out in 2020 especially regarding All Saints Church. The impact upon the setting of both this heritage asset and others south of the railway line (e.g., Grove Cottage farmstead) is predicted to be negative. However, it was felt that the master planning approach could help to ensure a strategy for enhancements was realised.

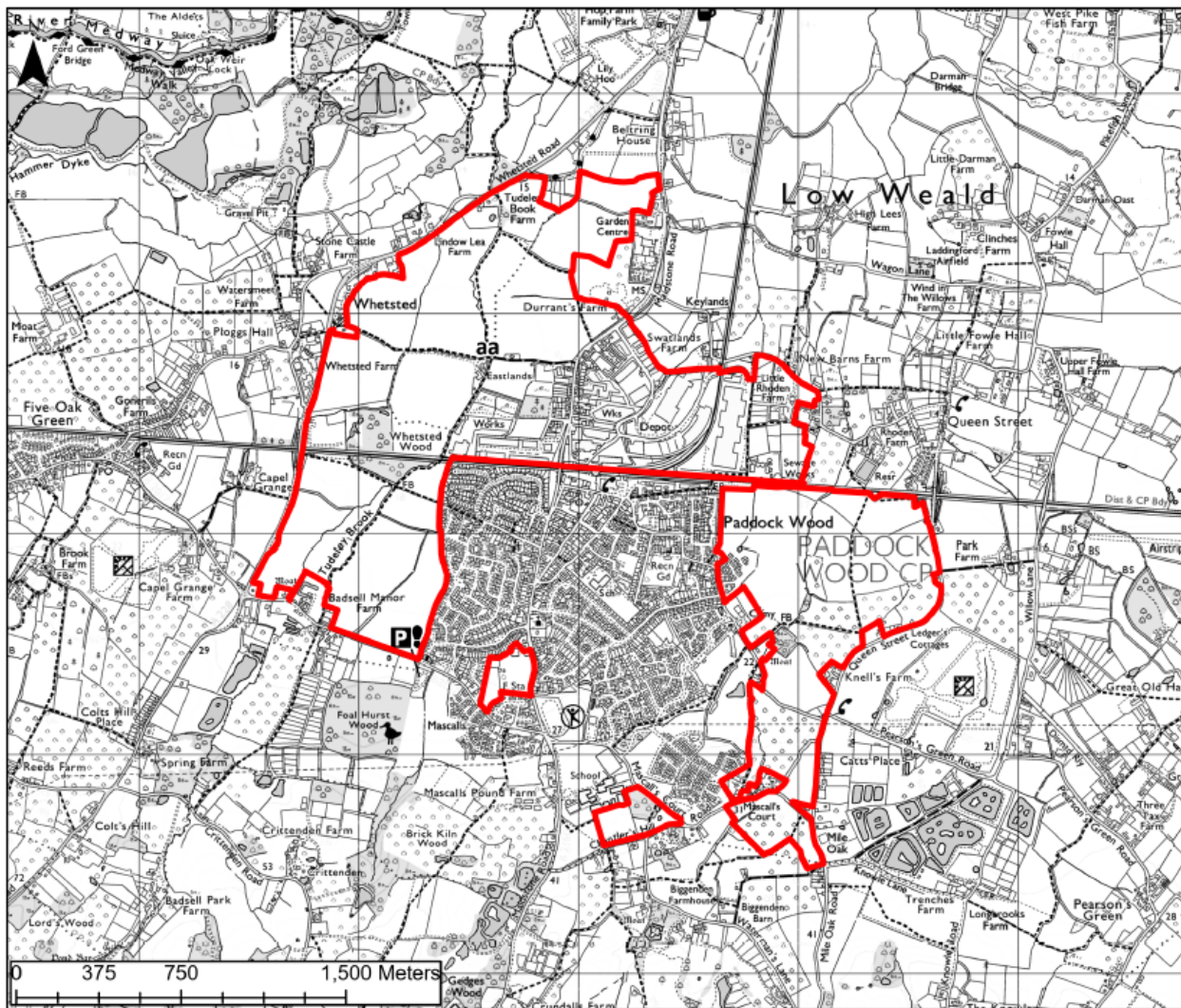
A strong positive score is applied for the housing objective for provision of substantial numbers of new dwellings, including affordable and accessible homes. However, the maximum score cannot be applied because housing needs would only be met in the short term and a risk remains that insufficient sites are found when the 5-year review takes place.

Land Use score reflects the scale of loss of greenfield and Green Belt land (albeit with compensation elsewhere) with Best and Most Versatile soils.

	<p>The landscape score follows a similar pattern to heritage reflecting encroachment into the AONB in the south and east whilst also recognising that opportunities for management of Green Infrastructure exist.</p> <p>The noise score reflects the scale of development and the location of development adjacent to the railway line. Minimal demolition would be necessary to facilitate development and choice of materials would be determined at Development Management stage. The master-planning approach for a large development and the strong sustainability credentials expected make responsible sourcing of materials more likely.</p> <p>The services and facilities objective scores positively reflecting the likely well-thought-out provision in the new settlement as a result of the master planning process. The settlement would also benefit from the proximity of enhanced provision at the nearby North Farm retail park, Tonbridge, and Royal Tunbridge Wells town centres. The deferred delivery of services and education facilities would not affect this score as services would still be delivered in line with housing growth.</p> <p>The travel score is applied with consideration of new bus routes and the relatively easy access to train stations. A mixed/positive water score is applied to reflect the scale of demand for water and wastewater treatment whilst also providing significant benefits to Five Oak Green in the form of reductions in existing flood risk.</p>
<p><b>Conclusion:</b></p>	<p>The site has been submitted as a potential new settlement. For the reasons set out, the site is currently considered unsuitable for allocation in the new Local Plan.</p>
<p><b>Reason:</b></p>	<p>The site has been considered on the basis of mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses.</p> <p>Key considerations for planning for new settlements/significant extensions to existing settlements are set out at para 73 of the NPPF.</p> <p>The delivery of this allocation would require comprehensive masterplanning, which is considered to ensure the appropriate infrastructure to support the development, and key constraints such as landscape and heritage can be properly assessed.</p> <p>Exceptional circumstances need to be demonstrated to justify release of this land from the Green Belt. As set out above, and identified in the Inspectors initial findings, there is concern that currently exceptional circumstances cannot be demonstrated. This re-assessment of the site raises concern associated with a reduced scale of delivery in the plan period, and the ability to deliver supporting infrastructure required to support an allocation of this strategic nature, including its sustainability credentials as a consequence of such concerns.</p>

**Site Reference: Includes sites 20, 47, 51, 79, 142, 212, 218, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 340, 342, 344, 347, 371, 374, 376, 402, late site 48, and DPC19 (Sustainability Appraisal: Paddock Wood Reasonable Alternative SS1 Revision A)**

**Site Address: Land at Capel and Paddock Wood**



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<b>Parish:</b>	Capel/Paddock Wood
<b>Settlement:</b>	Paddock Wood
<b>Gross area (ha):</b>	343.66
<b>Developable area (ha):</b>	Subject to masterplanning.
<b>Site type:</b>	Predominantly Greenfield land, with some areas of PDL
<b>Potential site use:</b>	Mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses, including primary and secondary education. Residential development and employment sites to be located within Flood Zone 1, outside of Flood Zones 2 and 3.
<b>Potential yield if residential:</b>	Approximately c. 2,250. This scale of growth excludes c. 360 units granted planning permission on land at Church Farm.

<p><b>Issues to consider:</b></p>	<p>AONB (1 component part);  Heritage - Listed Building;  Ecological interest; notable feature/designation;  Land Contamination (Recycling / Metal Waste, Sewage Treatment Works, Unknown Filled Ground (medium risk), Railway Land, Cemetery (modern), Works Unspecified Use, Depot);  SFRA Flood Zone 2, 3a, and 3b;  ALC: Grade 2, Grade 3  Cross boundary issues.</p> <p>There is extant planning permission for a total of 360 dwellings at Church Farm.</p>
<p><b>Site Description:</b></p>	<p>The site comprises predominantly agricultural land including crop and some top fruit, together with areas of woodland (some ancient woodland) and horse paddocks within the site. The site includes some buildings and areas of PDL. One site (Church Farm) has planning permission for residential development.</p> <p>The site is surrounded on its outer edges by further agricultural or paddock land, plus residences, recreational fishing lakes and solar farms (in some instances with roads forming the immediate boundaries with this land beyond). Within the inner boundaries of the site is predominantly residential, employment and educational uses comprising the existing settlement of Paddock Wood.</p> <p>Site boundaries comprise a mix of trees, hedging and fencing. There are a series of PROWs which run through the site, and in the land surrounding it.</p>
<p><b>Suitability:</b></p>	<p>This site option is considered unsuitable for the allocation of land at Paddock Wood and east Capel to provide a strategic urban extension to the existing settlement at Paddock Wood.</p> <p>It is acknowledged that a strategic development of this size would be comprehensively masterplanned, with regard given to flooding constraints across the site, and there is potential for the existing town to benefit from the substantial investment that new development would bring.</p> <p>Land to the west 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 original site assessment for the Submission Local Plan recognises that the Green Belt Review Study (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. Any future 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>It is noted there are heritage assets in vicinity of the site, and any development would need to at the very least preserve their settings. The masterplanning approach would enable these</p>

	<p>assets to be properly considered, and opportunities created to enhance their setting.</p> <p>The site is outside the AONB: the policy constraints of this national designation do not apply.</p> <p>This site option allows for an employment site to be provided within Flood Zone 1 land, as part of a development parcel that would also provide for residential use. The parcel is currently promoted and allocated in the Submission Local Plan for wholly residential use.</p> <p>This site option would be a wholly new employment location. Consideration has been given to the type of employment use that might be suitable for the site. There is likely visual impact from large B8 units, so it is better for Class E, although most demand for the town is for Class B8 space, hence, there are likely issues of hours of operation and traffic. Furthermore, the site is not being promoted for employment use, which raises doubt about availability and achievability.</p>
<b>Availability:</b>	<p>There is concern about availability of the site given that the NW parcel is not being promoted for employment use, which puts into doubt availability of the land.</p> <p>Multiple Ownership.</p>
<b>Achievability:</b>	<p>There is concern about the achievability of this site due to the inclusion of employment use in the NW development parcel, on land that is currently promoted (and allocated in the Submission Local Plan) for residential use. This puts into doubt the availability of the land for employment use.</p> <p>The site comprises individual sites that are promoted as one strategic allocation. All those who control the land are part of the Strategic Sites Working Group which was formed to help deliver strategic growth at Paddock Wood, in the event that the allocation (Policy SS1) in the Submission Local Plan is allocated.</p>
<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> <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.</p> <p>Climate change scores reflect the increase in energy and fuel demands created by the scale of new development with</p>

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 (including a new secondary school in Paddock Wood instead of Tudeley Village). 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 some benefit from 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. However, it was felt that the master planning approach could help ensure a strategy for enhancements was realised.

The housing objective scores well for provision of substantial numbers of new dwellings including afford able and accessible. Maximum score cannot be applied as housing needs would only be met in the short term and a risk remains that insufficient sites are found when the 5-year review takes place.

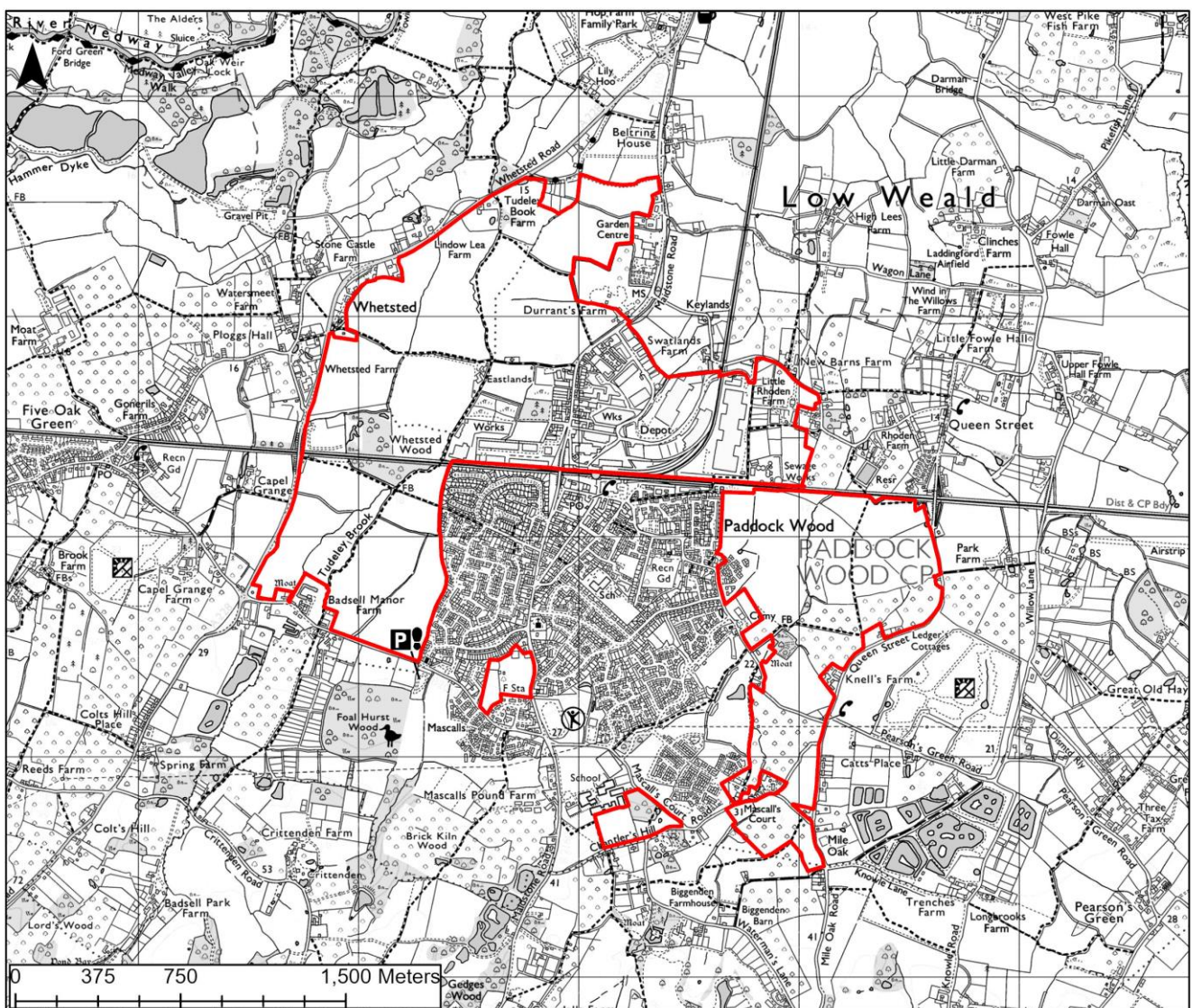
Loss of greenfield land with Best and Most Versatile soils causes land use to be scored negatively. The score also reflects the release of Green Belt land with overall harm rating of High. The landscape score follows a similar logic to heritage reflecting encroachment into the High Weald Character Area in the south. The reduction in employment land provides benefits for local landscape character.

The negative noise scores reflects the scale of development and the location of development adjacent to the railway line. Minimal demolition would be necessary to facilitate development. Choice of materials would be determined at Development Management stage. Master-planning approach for a large

	<p>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 positive water scores is applied as the development commits to new housing and employment land in Flood Zone 1 only. Maximum scores cannot be applied as the development would still represent a substantial demand for water and wastewater treatment.</p>
<b>Conclusion:</b>	Site is unsuitable as a potential Local Plan allocation.
<b>Reason:</b>	<p>The site has been considered on the basis of mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses, including education.</p> <p>Key considerations for planning for new settlements/significant extensions to existing settlements are set out at para 73 of the NPPF.</p> <p>The delivery of this allocation would require comprehensive masterplanning, which is considered to ensure the key constraints including flooding could be properly assessed.</p> <p>In accordance with national Green Belt policy, exceptional circumstances need to be demonstrated to justify release of this land from the Green Belt. Furthermore, delivery of the appropriate infrastructure to support an allocation of this strategic nature, is required.</p> <p>As set out in the suitability, availability, and achievability boxes above, there is concern about deliverability of the employment use on Flood Zone 1 land, given that it is not being promoted for this.</p>

**Site Reference: Amended Site Allocation Policy SS1 (includes sites 20, 47, 51, 79, 142, 212, 218, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 340, 342, 344, 347, 371, 374, 376, 402, late site 48, and DPC19) (Sustainability Appraisal: Paddock Wood Reasonable Alternative SS1 Revision B)**

**Site Address: Land at Capel and Paddock Wood**



<b>Parish:</b>	Capel/Paddock Wood
<b>Settlement:</b>	Paddock Wood
<b>Gross area (ha):</b>	344.48
<b>Developable area (ha):</b>	Subject to masterplanning.
<b>Site type:</b>	Predominantly Greenfield land, with some areas of PDL
<b>Potential site use:</b>	Mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses, including



	education provision. Residential development to be located within Flood Zone 1, outside of Flood Zones 2 and 3. Provision of employment land in Flood Zone 2.
<b>Potential yield if residential:</b>	Approximately c. 2,400 dwellings. See Paddock Wood Strategic Sites (Master planning) Addendum 2023. This scale of growth excludes 360 units that have been granted planning permission on land at Church Farm.
<b>Issues to consider:</b>	<p>AONB (1 component part);  Heritage - Listed Building;  Ecological interest; notable feature/designation;  Land Contamination (Recycling / Metal Waste, Sewage Treatment Works, Unknown Filled Ground (medium risk), Railway Land, Cemetery (modern), Works Unspecified Use, Depot);  SFRA Flood Zone 2, 3a, and 3b;  ALC: Grade 2, Grade 3  Cross boundary issues.</p> <p>There is extant planning permission for a total of 360 dwellings at Church Farm.</p>
<b>Site Description:</b>	<p>The site comprises predominantly agricultural land including crop and some top fruit, together with areas of woodland (some ancient woodland) and horse paddocks within the site. The site includes some buildings and areas of PDL. One site (Church Farm) has planning permission for residential development.</p> <p>The site is surrounded on its outer edges by further agricultural or paddock land, plus residences, recreational fishing lakes and solar farms (in some instances with roads forming the immediate boundaries with this land beyond). Within the inner boundaries of the site is predominantly residential, employment and educational uses comprising the existing settlement of Paddock Wood. Site boundaries comprise a mix of trees, hedging and fencing.</p> <p>There are a series of PROWs which run through the site, and in the land surrounding it.</p>
<b>Suitability:</b>	<p>This site is considered suitable for the allocation of land at Paddock Wood and east Capel to provide a strategic urban extension to the existing settlement at Paddock Wood.</p> <p>A strategic development of this size will be comprehensively masterplanned, and whilst it is acknowledged that there are flooding constraints across the site, these will be considered through the masterplanning. There is potential for the existing town to benefit from the substantial investment that new development would bring, including existing flood betterment. Under this option all new housing would be contained within Flood Zone 1, whilst new employment provision would be provided within Flood Zone 2 adjacent to the Key Employment Area.</p> <p>Land to the west 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 previous site assessment for the Submission Local Plan recognised that the Green Belt Review Study (2020) identifies that the release of the land from the Green Belt in this location will</p>

	<p>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>It is noted there are heritage assets in vicinity of the site, and any development would need to at the very least preserve their settings. The masterplanning approach would enable these assets to be properly considered, and opportunities created to enhance their setting.</p> <p>The site is outside the AONB: the policy constraints of this national designation do not apply.</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.</p>
<b>Availability:</b>	Available Multiple Ownership.
<b>Achievability:</b>	The site is suitable for allocation and is available. It comprises individual sites that are largely promoted as one strategic allocation (and most of those who control the land are part of the Strategic Sites Working Group which was formed to help deliver the strategic growth at Paddock Wood in the event it is allocated). It is considered that the site could come forward during the 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> <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.</p> <p>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.</p>

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 (including a new secondary school in Paddock Wood instead of Tudeley Village). 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 some benefit from 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. However, it was felt that the master planning approach could help ensure a strategy for enhancements was realised.

The housing objective scores well for provision of substantial numbers of new dwellings including afford able and accessible. Maximum score cannot be applied as housing needs would only be met in the short term and a risk remains that insufficient sites are found when the 5-year review takes place.

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.

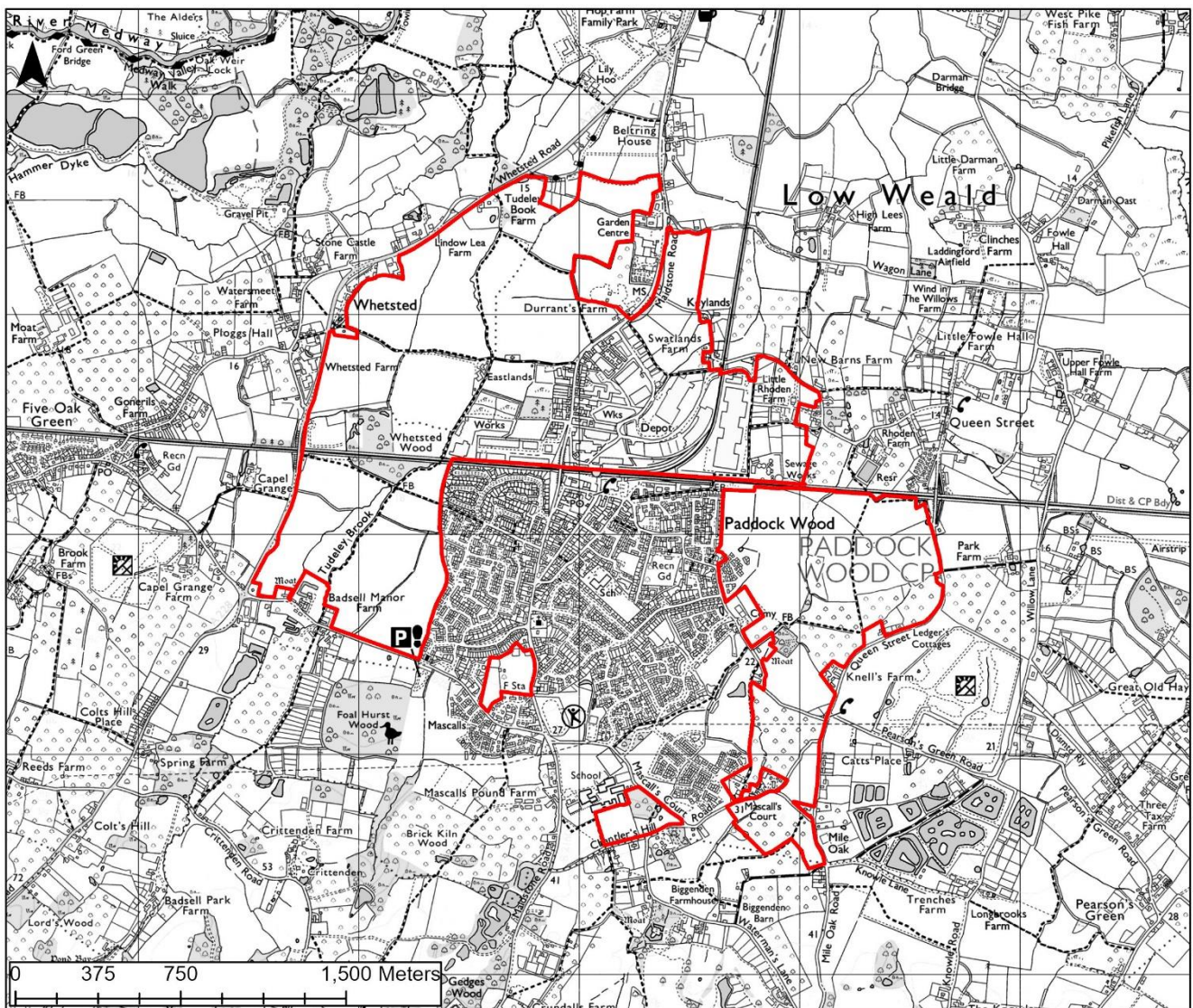
The landscape score follows a similar logic to heritage reflecting encroachment into the High Weald Character Area in the south. The reduction in employment land provides benefits for local landscape character.

The negative noise scores reflect the scale of development and the location of development adjacent to the railway line. 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

	<p>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 positive water scores is applied as the development commits to new housing in Flood Zone 1 only. Maximum scores cannot be applied as the development would still represent a substantial demand for water and wastewater treatment, and there is still some employment land in Flood Zone 2.</p>
<b>Conclusion:</b>	Site is suitable as a potential Local Plan allocation.
<b>Reason:</b>	<p>The site has been considered on the basis of mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses, including education.</p> <p>Key considerations for planning for new settlements/significant extensions to existing settlements are set out at para 73 of the NPPF.</p> <p>The delivery of this allocation would require comprehensive masterplanning, which is considered to ensure the key constraints including flooding could be properly assessed.</p> <p>If exceptional circumstances can be demonstrated to release this land from the Green Belt, and the appropriate infrastructure provided to support an allocation of this strategic nature, it is considered that this site is a suitable allocation.</p>

**Site Reference: Includes sites 20, 47, 51, 79, 142, 212, 218, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 340, 342, 344, 347, 371, 374, 376, 402, late site 48, and DPC19 (Sustainability Appraisal: Paddock Wood Reasonable Alternative SS1 Revision C)**

**Site Address: Land at Capel and Paddock Wood**



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<b>Parish:</b>	Capel/Paddock Wood
<b>Settlement:</b>	Paddock Wood
<b>Gross area (ha):</b>	359.64
<b>Developable area (ha):</b>	Subject to masterplanning.
<b>Site type:</b>	Predominantly Greenfield land, with some areas of PDL
<b>Potential site use:</b>	Mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses, including primary and secondary education. Residential development to be located within Flood Zone 1, outside of Flood Zones 2 and 3.

	Provision of employment land primarily in Flood Zone 2, but with some in Flood Zone 3.
<b>Potential yield if residential:</b>	Approximately c. 2,400. This scale of growth excludes c. 360 units granted planning permission on land at Church Farm.
<b>Issues to consider:</b>	<p>AONB (1 component part);  Heritage - Listed Building;  Ecological interest; notable feature/designation;  Land Contamination (Recycling / Metal Waste, Sewage Treatment Works, Unknown Filled Ground (medium risk), Railway Land, Cemetery (modern), Works Unspecified Use, Depot);  SFRA Flood Zone 2, 3a, and 3b;  ALC: Grade 2, Grade 3  Cross boundary issues.</p> <p>There is extant planning permission for a total of 360 dwellings at Church Farm.</p>
<b>Site Description:</b>	<p>The site comprises predominantly agricultural land including crop and some top fruit, together with areas of woodland (some ancient woodland) and horse paddocks within the site. The site includes some buildings and areas of PDL. One site (Church Farm) has planning permission for residential development.</p> <p>The site is surrounded on its outer edges by further agricultural or paddock land, plus residences, recreational fishing lakes and solar farms (in some instances with roads forming the immediate boundaries with this land beyond). Within the inner boundaries of the site is predominantly residential, employment and educational uses comprising the existing settlement of Paddock Wood.</p> <p>Site boundaries comprise a mix of trees, hedging and fencing. There are a series of PROWs which run through the site, and in the land surrounding it.</p>
<b>Suitability:</b>	<p>This site option is considered unsuitable for the allocation of land at Paddock Wood and east Capel to provide a strategic urban extension to the existing settlement at Paddock Wood.</p> <p>It is acknowledged that a strategic development of this size would be comprehensively masterplanned, with regard given to flooding constraints across the site, and there is potential for the existing town to benefit from the substantial investment that new development would bring.</p> <p>Land to the west 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 previous SHELAA site assessment acknowledged that the Green Belt Review Study (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. Any future 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>It is noted there are heritage assets in vicinity of the site, and any development would need to at the very least preserve their settings. The masterplanning approach would enable these assets to be properly considered, and opportunities created to enhance their setting.</p> <p>The site is outside the AONB: the policy constraints of this national designation do not apply.</p> <p>This site option allows for employment uses within Flood Zone 3, which would be contrary to the NPPF which directs development away from areas at highest flood risk. This raises significant doubt about achievability of this option. For this option to be suitable it would be necessary to pass a sequential, risk-based approach to the location of development (including that there are no other reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding).</p>
<b>Availability:</b>	<p>The site is available. Multiple Ownership.</p>
<b>Achievability:</b>	<p>There is concern about the achievability of this option due to the inclusion of employment use in Flood Zone 3, for which the sequential test would need to be met, demonstrating the lack of alternative sites in lower flood zones.</p> <p>The site comprises individual sites that are largely promoted as one strategic allocation. Most who control the land are part of the Strategic Sites Working Group which was formed to help deliver strategic growth at Paddock Wood, in the event that the allocation (Policy SS1) in the Submission Local Plan is allocated.</p>
<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.</p> <p>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> <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.</p> <p>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.</p>

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 (including a new secondary school in Paddock Wood instead of Tudeley Village). Adult education facilities are not considered, and it is expected that Royal Tunbridge Wells would continue to meet this demand.

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

The housing objective scores well for provision of substantial numbers of new dwellings including affordable and accessible. Maximum score cannot be applied as housing needs would only be met in the short term and a risk remains that insufficient sites are found when the 5-year review takes place.

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.

The landscape score follows a similar logic to heritage reflecting encroachment into the High Weald Character Area in the south. The reduction in employment land provision is largely similar to the Submission Local Plan.

The negative noise scores reflects the scale of development and the location of development adjacent to the railway line. 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



	<p>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 positive water scores is applied as the development commits to new housing in Flood Zone 1 only. Maximum scores cannot be applied as the development would still represent a substantial demand for water and wastewater treatment, and there is still some employment land in Flood Zone 2 and 3.</p>
<b>Conclusion:</b>	Site is unsuitable as a potential Local Plan allocation.
<b>Reason:</b>	<p>The site has been considered on the basis of mixed use (significant extension/expansion of existing settlement) of residential, employment and associated land uses, including education.</p> <p>Key considerations for planning for new settlements/significant extensions to existing settlements are set out at para 73 of the NPPF.</p> <p>The delivery of this allocation would require comprehensive masterplanning, which is considered to ensure the key constraints including flooding could be properly assessed.</p> <p>In accordance with national Green Belt policy, exceptional circumstances need to be demonstrated to justify release of this land from the Green Belt. Furthermore, delivery of the appropriate infrastructure to support an allocation of this strategic nature, is required.</p> <p>As set out in the suitability, there is concern about the achievability of this option, given that it includes employment uses on Flood Zone 3 land.</p>