Development in High Weald AONB
Note: list of sites is not exhaustive - for illustrative comparison purposes only
Red = the site the RARD group is representing
Blue = sites identified by TWBC with potential school use

Site reference	137	30 with 100, 199 & 205	73	99	114	116	146	280	384	411	434	459 with 23, 111, 114, 326, 333, 341, 383 & additional land (acc & ecn	
Site name	Land to West of Eridge Road at Spratsbrook Farm (Ramslye Farm), TN3 9ET?	Land at Cannwood Farm and Whitegates Farm, Reynolds Lane, TN4 9NJ?	Land at Pembury Road (South), TN2 4NE?	Land at Pembury Road, TN2 4NE?	Land at Sandown Park, west of A21, TN2 4RT?	Land South of Pembury Road	Tunbridge Wells Golf Club, Langton Road, TN4 8XH	Land at The Midway, Nevill Court, TN4 8NJ?	Land at Great Bayhall, TN3 9AA?	Land at Sandown Park between Pembury Grange & A21, TN2 4RT?	Tutty's Farm Hawkenbury, TN2 5RE/TN3 9AD?	Land at Kipping's Cross, TN12 7RB	
Use & yield	270 residential & 7 form secondary school	750-1500 residential & education	214 residential or education	197 residential	292 residential	216 residential	Mixed use including education (187 if soley residential, 30-45 if education)	121 residential	Mixed use scheme/ 3500 residential	165 residential	208 residential	Mixed including residential	
Suitability	Suitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	Unsuitable	
Sustainability objectives:													Notes/challenges to scores
Air	-	--/--		-	-	0/+	-	No sustainability assessment	No sustainability assessment	-	?	No sustainability assessment	It is not clear how this score has been arrived at for site 137. "Air quality is scored as negative overall because of the large size of the development and likelihood that new vehicles will utilise the A26 as a through route". "There is also a need to meet nitrogen dioxide reduction targets along the A26 in Royal Tunbridge Wells, which is identified as an Air Quality Management Area." We can see no reason why the score should not be --/-- as per site 30 ("the substantial use of private vehicles in this location causes the noise and air objectives to score very negatively"). The issues for sites 137 & 30 are ostensibly the same - located at the edge of the borough and acknowledgement of increased traffic.
Biodiversity	0/-	-	0	0	0	-	-/--	No sustainability assessment	No sustainability assessment	0	0/-	No sustainability assessment	It is not at all clear why site 146 has scored so much worse than site 137. Even though site 137 is technically undesignated, the presence of protected species such as bats, dormice, adders and great crested newts should increase the negative score. The draft plan makes reference to site 137 being a Biodiversity Opportunity Area. The site provides wildlife corridors between Hargate Forest, Friezland Wood & Broadwater Warren. In addition, the site is only just outside the Ashdown forest 7km protection zone and we would expect a proper impact assessment to be carried out given the negative air quality score, as to our knowledge NO2 does not respect lines drawn on maps. 15km was considered as the potential zone.
Business Growth	0	0	0	0	0/+	0	0	No sustainability assessment	No sustainability assessment		0	No sustainability assessment	
Climate Change				-	0/-	0/-	-	No sustainability assessment	No sustainability assessment	0/-	0/-	No sustainability assessment	
Deprivation	0	0	0	0	0	0	0	No sustainability assessment	No sustainability assessment	0	0	No sustainability assessment	
Education	++/+++	-/--	0/+	0/+	0/+	0/+	0/-	No sustainability assessment	No sustainability assessment	0/+		No sustainability assessment	It would appear these all score very positively compared to other sites because of the proposed siting of a secondary school. Other sites in the attached spreadsheet were also assessed for schools (sites 30, 73 & 146; 384 & 459 (mixed use) were omitted from appraisal) but they have not been scored anywhere near as positively. These scores should be reviewed and made consistent. Site 146 should also be considered alongside RTW9 (Lifestyle Motor Europe) which neighbours it & could be developed together, providing more flexibility.
Employment	++	+	+	+	+/++	+	+	No sustainability assessment	No sustainability assessment	+	+	No sustainability assessment	The ++ relates to a potential school. If no school, no ++. Sites 30, 73 & 384 should also be ++.
Equality	++	?				0/+	?	No sustainability assessment	No sustainability assessment	+	+	No sustainability assessment	The equality score only applies if a non-selective school is there. All potential school sites should be scored the same.
Health	0/+	+	0/+	0/+	0/+	0/+	0	No sustainability assessment	No sustainability assessment	0/+	0/+	No sustainability assessment	
Heritage	--	--		--/--	0	--		No sustainability assessment	No sustainability assessment	0/-	-	No sustainability assessment	This score is too low and does not adequately take account of the Scheduled Monument (Historic England) that is in part in the site, along with other heritage constraints (listed buildings and historic farmstead). It is not clear why site 99 scores --/--.
Housing	++/+++	++/+++	+/++	+/++	+	+	++	No sustainability assessment	No sustainability assessment	+/++	++	No sustainability assessment	This is simply a size of land issue; if it is >5 Ha it should score +++ at 30 units per Ha. The appraisals contain errors. With the exception of site 280, all sites listed here should be scored +++ as >250 dwellings are possible.
Land Use	--	--	-/-	--/--	--/--	--	--	No sustainability assessment	No sustainability assessment	--/--	--/--	No sustainability assessment	The land is ALC Grade 3a and 3b and is therefore subject to the greatest level of protection under the Best and Most Versatile rules; as such it should be scored as - - -. Site 146 is already developed (golf course) so should score 0 or maybe - as loss of green space.
Landscape	--	--/--	-	--/--	0/-	--/--	-/--	No sustainability assessment	No sustainability assessment	--	--	No sustainability assessment	Given the site is high value Green belt, in the AONB (the highest level of protection) and is so visually prominent, it should be scored consistently with other sites (30, 99 & 116) at - - -. Any development would have a severe negative impact on the landscape.
Noise	-/--	--/--	0/-	0/-	0/-	0/-	-/--	No sustainability assessment	No sustainability assessment	0/-	0	No sustainability assessment	Sites 137, 30 & 146 are impacted by the Gatwick flight path to a similar extent. The A26 (site 137) currently gets 23406 motor vehicles per day; the A264 (site 146) currently gets 9034 motor vehicles per day. No data for Reynolds Lane (site 30). Site 137 should score --- or --/---. Site 30 should score much more favourably given its likely current traffic volume. Site 146 should score somewhere in between.
Resources	0/?	?/-	0/?	0/?	0/?	0/?	?	No sustainability assessment	No sustainability assessment	0/?	?/-	No sustainability assessment	
Services and Facilities	++	+	++	++	++	++	+	No sustainability assessment	No sustainability assessment	++	+/++	No sustainability assessment	It is not clear why this has been scored more positively than sites 30 and 146; all are similar distances to the town centre and housing (with site 30 close to a school and sports centre) so they should be scored consistently.
Travel	+/++	?	+	+	0	+	0	No sustainability assessment	No sustainability assessment	0	0/+	No sustainability assessment	The guidelines appear to suggest that travel has the same scoring methodology as air quality. It is not clear why this has been scored so positively in comparison to sites 30, 73 & 146 (& 99). The site is on the borough/county boundary. Increased traffic is acknowledged, as is the borough's low bus usage, and the existing cycle lanes on other sites are listed as issues not positive factors in relation to active travel. Site 146 is on A264 which gets 62% less traffic (9034 vehicles per day) than A26 (23406 vehicles per day). Development here would give a fairer distribution of traffic and less congestion; this should score ++. Site 146 also has good existing access as it's to a golf course. There is some overlap here with services and facilities.
Waste	0	0	0	0	0	0	0	No sustainability assessment	No sustainability assessment	0	0	No sustainability assessment	
Water	?	0	0	0	0	0	0/-	No sustainability assessment	No sustainability assessment	0	0	No sustainability assessment	Why scored as "?" "Water objective is scored as mixed overall to reflect the conflict between the site being in flood zone 1 but also increasing demand on existing water supplies"
Commentary	The scores for this site are mixed. Despite likely contributions to improved active travel and sustainable transport options, air quality is scored as negative overall because of the large size of the development and likelihood that new vehicles will utilise the A26 as a through route. The Water objective is scored as mixed overall to reflect the conflict between the site being in flood zone 1 but also increasing demand on existing water supplies. Negative score for noise because the site is near to the main Gatwick flight path and is likely to result in a large increase of vehicle movements onto a road that already experiences high levels of road noise. This site scores positively for the education, employment and equality objectives because of the provision of a new secondary school in an area of high demand which will provide new jobs and is likely to be non selective, mixed gender school in an area where selective and single gender schools are common. The latter benefit is not guaranteed by policy though. The negative land use and landscape scores reflect the loss of greenfield land which is also Green Belt. Finally heritage score negatively due to the compromised setting of the Hill Fort (a Scheduled Ancient Monument) and complete loss of assart field.	This is a large site that would make a significant positive contribution to the housing objective. However, the substantial use of private vehicles in this location causes the noise and air objectives to score very negatively. The site also has sensitive biodiversity, heritage and landscape features.	This site scores a number of neutral scores with some positive ones. Negative scores are given for air, heritage, land use and landscape and noise. The site is a greenfield site in the AONB, part of a larger Green Belt parcel of land that would cause very high harm if released from the Green Belt. The land use score has been adjusted to reflect site is a smaller part of the larger parcel. The location of the site along Pembury Road relative to distance to key services and facilities and ease of use by pedestrians is likely to encourage car use. This has informed the air score given. Noise score reflects location along the busy Pembury Road.	This site scores a number of neutral scores with some positive ones. Negative scores are given for air, climate change, heritage, land use, landscape and noise. The site is a greenfield site in the AONB, part of a Green Belt parcel of land that would cause high harm if released from the Green Belt. The location of the site along Pembury Road relative to distance to key services and facilities is likely to encourage car use. This has informed the air score and climate change score given. Noise score reflects location along the busy Pembury Road. The site forms part of the landscape setting of the main urban area of Tunbridge Wells and helps prevent coalescence between Tunbridge Wells and Pembury, the frontage is within the Conservation Area. This has influenced the heritage and landscape scores given.	This site scores a number of neutral scores with some positive ones. Negative scores are given for air, land use and noise. Land Use score is informed by the loss of a greenfield site which is part of a Green Belt parcel the release of which would cause high harm. Air and noise scores are influenced by the location of the site adjacent to the A21 and close to the Pembury Road.	Site scores neutral scores and some positives. Negative scores have been given for land use, landscape and biodiversity. The site is a greenfield site in the AONB, a woodland parcel, the loss of which would be detrimental to the AONB, reflected in the negative landscape score given along with impact on the setting of Tunbridge Wells. Land use is influenced by the site being the Green Belt, part of a parcel that would cause very high harm if released. The negative biodiversity score is influenced by the wooded nature of the site.	This site has mixed scores. Negative score for noise because the site is within the main Gatwick flight path and will result in a large increase of vehicle movements onto a road that already experiences high levels of road noise. Negative land use and landscape scores reflect the loss of greenfield land with complex topography which is classified as very high value Green Belt. Air quality is scored as negative overall as it was felt that the negative aspects of increased car travel could not be offset by the contributions gained for active travel improvements.	No sustainability assessment	No sustainability assessment	This site scores a number of neutral scores with some positive ones. Negative scores are given for air, land use, landscape and noise. Land use score is informed by the loss of a greenfield site which is part of a Green Belt parcel the release of which would cause high harm. Air and noise scores are influenced by the location of the site adjacent to the A21 and close to the Pembury Road. The landscape negative score is influenced by the loss of a greenfield site which contributes to the landscape setting of Tunbridge Wells.	This sites scores a mix of scores, with several neutral scores and some positives. Negative scores are given for heritage, land use and landscape. The heritage score is informed by likely impact on the settlement edge and landscape setting of Tunbridge Wells. The site is a Green Belt parcel that if released from the Green Belt would cause high harm, it a greenfield site that has agricultural land classification 1. This has informed the land use score given whilst the loss of the greenfield site and its likely effect on the settlement edge has informed the landscape score given.	No sustainability assessment	
SHELAA issues to consider:													
Green Belt	Designation	Considerations	Considerations	Considerations	Considerations	Designation	Designation	Considerations	Considerations	Considerations	Designation		
AONB	2 parts	3 parts	3 parts	1 part	2 parts	2 parts	2 parts	2 parts	10 parts	2 parts	3 parts	10 parts	Based on the 2 maps (HW AONB & Magic) available on the High Weald AONB website, the following sites appear to be within the TW conurbation and NOT in the AONB: Sites 30, 99, 114, 146, 280, 411, 434. This has been confirmed by the HW AONB team.
Landscape	Landscape Sensitivity Study (ES1)	Landscape Sensitivity Study (SP12)	Landscape Sensitivity Study (BA3); local Plan Landscape designation	Landscape Sensitivity Study (PE4)	Landscape Sensitivity Study (PE4)	Landscape Sensitivity Study (BA3)	Landscape Sensitivity Study (SP16)	Landscape Sensitivity Study (SP20)		Landscape Sensitivity Study (PE4)	Landscape Sensitivity Study (adjacent to BA5)	Landscape Sensitivity Study (MG1B1; BM1; MB2)	
Ecological interest; notable feature/designation	Yes [Biodiversity Opportunity Area]	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Heritage	Adjacent to Conservation Area [Some commentary but ommissions from list: Scheduled Monument (archaeological potential); adjacent to listed buildings; historic farmstead]	Adjacent to Historic Farmsteads/ Listed Buildings	Part within Conservation Area	Part within / adjacent to Conservation Area	Adjacent to Listed Building	Part with/ mostly adjacent to Conservation Area	Conservation Area	Adjacent to Conservation Area/adjacent to Arcadian Area	Listed buildings, and views from Dunorlan Park Historic Park and Garden		Historic Farmstead within site	Listed buildings on / adjacent to site	
Limits to Built Development	Adjacent		Adjacent	Adjacent	Adjacent		Adjacent	Adjacent		Adjacent	Adjacent		
Highway matters	Yes	Yes	Yes	Yes	Yes	Yes	-		Yes		Yes	Yes	
Land contamination	Unknown Filled Ground (medium)	Manufacture of Clay Bricks, Unknown Filled Ground, landfill site					Unknown Filled Ground (medium and low risk)		Landfill site and Unknown filled Ground; Minerals and waste		Manufacture of clay bricks and landfill site	Depot / Dispensing of Automotive Vehicles; landfill site	
Agricultural Land Classification	Grade 4, Urban [incorrect. 3a & 3b. assart field]	Grade 3, Grade 4, Urban	Grade 3, Urban	Grade 3, Urban	Grade 3	Grade 3	Grade 4, Urban	Grade 4	Grade 3, Grade 4	Grade 3	Grade 3	Grade 2, Grade 3, Grade 4	
Tree Preservation Order		Yes	Yes	Yes			Yes	Yes	On part of site				
Flood		Zones 2 and 3							Zones 2 and 3			Zones 2 and 3	
Cross boundary	Yes [no defined boundary]												
Cycle route			In proximity to national route	In proximity to national route		In proximity to national route	In proximity to local route			In proximity to national route			
Road noise	[not mentioned but clearly an issue]			Potential	Potential	Potential							
Gas main					High pressure gas main under Pembury Road/ Black Hurst Lane;								
Ancient woodland	[in & adjacent - not in SHELAA but in plan]								Considerations related to access outside of the site				
Infrastructure												Yes	
Reason	Adjacent to urban area & A26 [see errors & omissions listed above]	Landscape impact & highways	Existing building primarily on opposite side of road; landscape; potential highways; Green Belt - very high harm	Landscape impact, settlement pattern, coalescence of RTW & Pembury, Green Belt - high harm, highways	Landscape impact, settlement pattern, Green Belt - high harm, highways	Not well related to built development, landscape harm, Green Belt - very high harm	Coalescence between Rusthall & RTW, Green Belt - very high	Heritage impact, Green Belt - very high harm	AONB - SHELAA has demonstrated availability of suitable sites outside AONB, Green Belt - TWB study 2017 "high", traffic	Landscape impact, settlement pattern, coalescence of RTW & Pembury, Green Belt - high harm, highways (note absence of highways from above)	Highways & AONB	AONB - SHELAA has demonstrated availability of suitable sites outside AONB, small part in Green Belt [not listed above], impact on A21, housebuilder has withdrawn	