TONBRIDGE AND MALLING LOCAL PLAN 2024 TO 2042: REGULATION 19 PUBLICATION VERSION

Objection to allocation PL1

Land South of Potash Lane and North of Paddock Orchard, Platt (Land Availability Assessment site 59617)

Respondents	Susan Butterfill & John Cox (husband & wife)	
Address	Lullingstone, Paddock Close, St Mary's Platt, Sevenoaks, TN158NN	
Our interest	Local residents who live directly opposite the plot in mention. We have knowledge of the issues we have raised as detailed below.	
Parts of the Plan	Policy A1 (allocation PL1); Annex 3 (sites to be removed from the Green Belt); Annex 6 (development criteria for PL1); Policies Map (PL1 and the Green Belt boundary at Platt)	
Legally compliant?	No: the Sustainability Appraisal assesses PL1 on the basis of mitigation the Plan does not contain (Section 11)	
Sound?	No: not justified, not effective, and not consistent with national policy	
Change sought	Delete allocation PL1 and keep the land in the Green Belt (Section 12)	
Hearings	We wish to take part in the hearing sessions (Section 13)	
National policy	References are to the National Planning Policy Framework of December 2024 (NPPF), against which the Council states this Plan will be examined.	

1. Summary

1.1 Allocation PL1 would put 16 houses on a narrow Green Belt field of Grade 2 farmland on the southern edge of Platt. Its north-east end adjoins the Pigeon's Green farmstead, a group of three Grade II listed buildings inside the Platt Conservation Area, and Patchways, a Grade II listed cottage dated 1637. The Council's own Heritage Impact Assessment finds moderate harm to the Conservation Area, to Patchways and to the farmstead, describing the effect on the farmstead as "permanent severance" from its rural hinterland.

1.2 We ask for PL1 to be deleted, for these reasons:

a) **Heritage harm without justification.** The harm identified in the Council's own evidence is not outweighed by the public benefit of 16 homes in a plan that already provides 958 more homes than its requirement (Section 5).

b) **The site criteria do not secure the mitigation the evidence relies on.** The Heritage Impact Assessment reaches "low" residual harm only with four mitigation measures. Annex 6 omits two of them (a height limit, and retention of the hedgerow and trees) and puts the buffers in different places. The Sustainability Appraisal then treats the heritage effect as negligible (Sections 5 and 11).

c) **The site sits up to 7 metres above the listed buildings.** Environment Agency LiDAR shows the field averaging 5.7m above the ground at The Barn. No evidence document considers this, although we raised it at Regulation 18 (Section 4).

d) **The Green Belt justification contains basic errors.** The site-specific exceptional circumstances paper calls this greenfield field "brownfield land", says it performs "moderately" after rating it "Strong",

places Potash Lane on the wrong boundary, and answers "No" to the heritage constraint test (Section 6).

e) **It is not grey belt.** National policy excludes from grey belt land where heritage policies provide a strong reason for restricting development. The Council's own heritage advice is that development here must be restricted (Section 6).

f) **It is best and most versatile farmland.** The whole site is Grade 2 agricultural land (Section 7).

g) **There is no evidence of safe access.** Potash Lane is single-track, with no footways or street lighting, blind bends and poor junction visibility, and the nearest bus stop is about half a mile away. No highway assessment has been carried out and Annex 6 contains no access requirement (Section 8).

h) **Other impacts are unassessed or unmitigated.** These include the landscape, the Wealdway, the protected roadside hedgerow, biodiversity and groundwater (Sections 9 and 10).

1.3 The yield rose from 5 homes at Regulation 18 to 16 at Regulation 19 on an unchanged boundary, and the Council's only stated reason is "Revised reference and yield". Deleting PL1 would reduce supply by 16 homes and leave the Plan 942 homes above its requirement.

2. Our interest and previous comments

2.1 We across the road to The Barn, the 18th century farm building listed at Grade II as "Farm building 30yds to the west of Pigeon's Green Farmhouse" (list entry 1072678). There properties adjoin the north-east end of the site and look directly onto it (Photos 1 to 4 in the attached photo sheet).

2.2 We and many others objected at Regulation 18 by letter dated 11 December 2025 (attached). The Sustainability Appraisal consultant's response is recorded at pages 416 to 417 of the Regulation 19 Sustainability Appraisal. Several of our points raised, including the difference in ground levels, the access, the hedgerow and the Wealdway, have not been addressed in the evidence or in the Plan.

3. The site and what has changed

3.1 PL1 is a 0.73ha field (0.60ha developable) on the south side of Potash Lane, between the lane and a block of mature woodland. The Land Availability Assessment records it as agricultural land: 100% Grade 2, 97.9% Green Belt, 100% within Groundwater Source Protection Zone 3 and 93.6% at risk of groundwater flooding (LAA Site Assessments Part 2, site 59617). The Landscape and Visual Appraisal describes an L-shaped parcel with a narrow strip wrapping around two houses on Potash Lane (LVA Part 4, p.632).

3.2 The north-east end of the site adjoins the Pigeon's Green farmstead and the Platt Conservation Area. The vehicle entrance would be the five-bar field gate at the south-west end, next to the residential property Stanbredges.

3.3 At Regulation 18 the site was allocation PL2 for 5 homes. At Regulation 19 it has become PL1 for 16 homes with the same boundary. The Council's justification document records only "Revised reference and yield" (Development Allocations: justification for updates between Regulation 18 and Regulation 19, p.6). No capacity, layout, heritage or highway work explains the increase to more than three times the previous figure. The other Regulation 18 allocation in Platt (Rear of Platt Mill Close, 10 homes) was removed, with no reason given in the same document.

3.4 The Plan's housing requirement is 20,106 homes and its identified supply is 21,064, a surplus of 958 (Figure 5.3). PL1 amounts to 0.08% of the requirement. The Plan does not need it to meet its requirement.

4. Ground levels: the site sits above the listed buildings

4.1 We have taken 40 ground-level readings from the Environment Agency's LiDAR Composite Digital Terrain Model (1m resolution, bare earth, excluding trees and buildings). Positions were located from the PL1 site plan in the Council's Heritage Impact Assessment. All readings, with coordinates so that anyone can check them, are in Appendix A.

Location	Ground level (metres above sea level)
Patchways (Grade II)	103.1m
Location	**Ground level (metres above sea level)**
The Barn (Grade II)	103.8m
Garden of The Barn	103.9m
Pigeon's Green Farmhouse (Grade II)	105.0m
Site: end nearest The Barn (about 30m from it)	106.1m to 107.5m
Site: remainder (about 50m to 180m from The Barn)	107.7m to 110.8m
Site: average of 27 readings	109.5m
Woodland edge immediately behind the site	108.6m to 112.1m

4.2 Most of the site therefore sits 5 to 7 metres above the ground on which the listed farmstead stands: 5.7m higher on average and 7.1m at its highest point. Two-storey houses are typically 8 to 9 metres to the ridge, so their ridges would stand roughly 14 to 16 metres above the ground at The Barn. Figure 1 shows the profile.

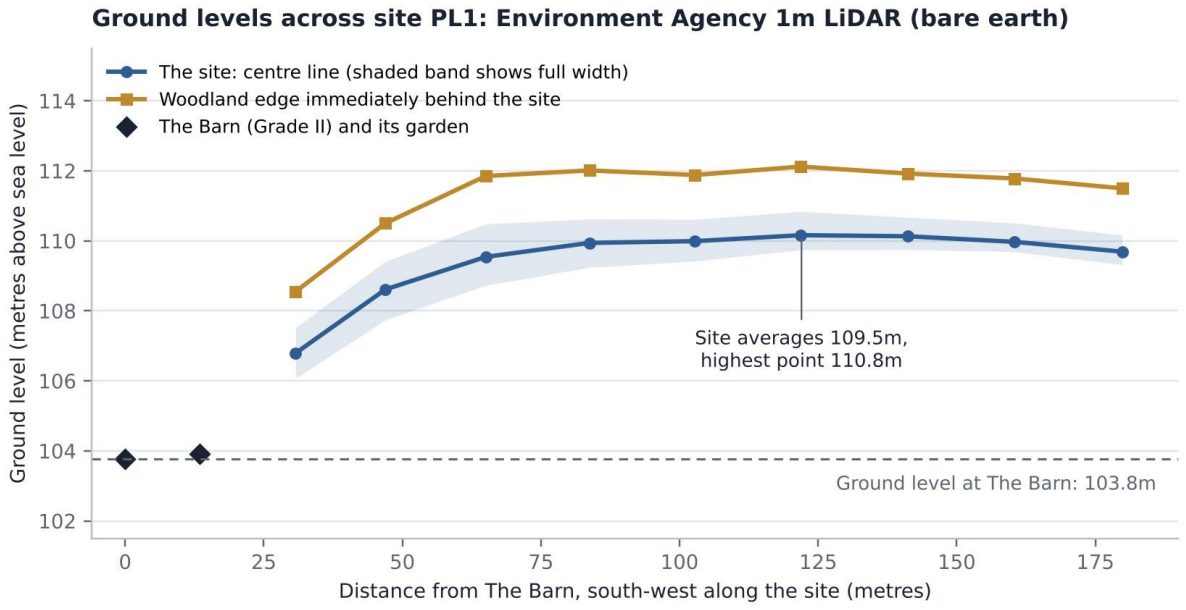


Figure 1: Ground levels along PL1 from The Barn south-west to the far end of the site. Source: Environment Agency LiDAR Composite DTM (1m). Readings in Appendix A.

4.3 Our Regulation 18 letter made the same point using topographic mapping (106 to 107m for the listed

buildings, rising to 112m on the field). The LiDAR confirms the difference in levels. The Sustainability Appraisal response moved the point to the landscape objective without addressing it (SA p.417). The Heritage Impact Assessment, the Landscape and Visual Appraisal, the Green Belt evidence and Annex 6 do not mention it at all.

4.4 This matters for three reasons. First, houses on the higher ground would dominate the farmstead and Patchways, and would be seen above and behind them from Potash Lane and the Conservation Area. Second, reducing that dominance would need substantial earthworks (levels within the site vary by almost 5 metres), causing further harm to the historic field and bringing heavy construction traffic onto single-track lanes. Third, water on the slope drains towards the lower listed buildings (Section 10).

5. Heritage

Soundness tests failed: not justified; not effective; not consistent with national policy.

The heritage assets

5.1 The site adjoins, and forms part of the setting of:

a) **the Pigeon's Green farmstead:** Pigeon's Green Farmhouse, 16th century (Grade II, list entry 1362058), and two 18th century farm buildings of stone with brick dressings (Grade II, list entries 1072678 and 1072677). Both farm buildings are listed for group value only. Their special interest lies in their relationship with the farmhouse and with each other as a historic farmstead, and that relationship depends on their agricultural setting;

b) **Patchways**, a cottage dated 1637 incorporating an earlier timber frame (Grade II, list entry 1072697, also marked for group value);

c) **the Platt Conservation Area**, which the Heritage Impact Assessment records as adjoining the site to the north, north-east and west, and which contains the listed farmstead (HIA, August 2026, p.66);

d) **Stanbredges**, the building beside the field gate proposed as the site entrance, which we consider a non-designated heritage asset (NPPF paragraph 216). None of the evidence assesses it.

What the Council's own evidence says

5.2 The Heritage Impact Assessment (CBA for the Council, August 2026, pp.66 to 67) finds that the site "directly informs the rural setting and outward views" of Patchways and the farmstead group. It identifies three moderate impacts:

- erosion of the rural setting of the Conservation Area and of the transition between village and countryside;
- disruption of sensitive outward views from Patchways and of its historic rural character;
- the "permanent severance" of the farmhouse and its farm buildings from their "functional rural hinterland".

5.3 The Council's earlier Heritage Impact Risk Assessment (October 2025, pp.9 to 10) had already identified this site, then proposed for 5 homes, as one where urbanisation and loss of open space would affect heritage settings.

Why the allocation is unsound

5.4 **Not consistent with national policy.** Great weight must be given to the conservation of designated heritage assets, irrespective of the level of harm (NPPF paragraph 212). Any harm requires clear and convincing justification (paragraph 213), and less than substantial harm must be weighed against the public benefits (paragraph 215). The Plan and its evidence contain no such justification for PL1. The public benefit of 16 homes is very small in a plan with a 958-home surplus, and those homes could be provided elsewhere without this harm.

5.5 **Not effective: the mitigation the evidence relies on is not in the Plan.** The Heritage Impact Assessment reaches its conclusion of "low" residual harm only with four mitigation measures (p.67). Annex 6 (p.514) secures only part of them:

Mitigation the HIA relies on (p.67)	Required by Annex 6?
A significant green buffer and soft development edges along the northern and eastern boundaries	Only in part. Annex 6 asks for buffers to the "northeast and west", a different arrangement, with no indication of their extent
Retain and reinforce all mature trees and boundary hedgerows, particularly along the Potash Lane frontage	No
Mitigation the HIA relies on (p.67)	**Required by Annex 6?**
Restrict building heights so that new buildings remain subservient to the treeline and woodland backdrop	No
A programme of archaeological work	Yes

5.6 Without the omitted measures the evidence does not support a finding of low residual harm. On the Council's own assessment the harm would remain moderate.

5.7 **Not justified: the assessment misses key evidence.**

- **a)** **Topography.** A height limit framed against the "treeline" does not deal with ground that is 5 to 7 metres above the farmstead (Section 4). Even that limit is absent from Annex 6.
- **b)** **Historic farmsteads.** Paragraph 8.12 of the Plan requires proposals affecting historic farmsteads to draw on the Kent Farmsteads Guidance (2014). There is no sign that this guidance informed the assessment of PL1, although the Heritage Impact Assessment itself identifies the farmstead's relationship with its land as the central issue.
- **c)** **Setting.** Historic England's guidance on setting (GPA3, The Setting of Heritage Assets, 2017) treats topography, views and an asset's relationship with its surrounding landscape as part of its setting. Its advice on site allocations (HEAN3, The Historic Environment and Site Allocations in Local Plans, 2015) ends by asking whether an allocation is appropriate at all once the harm is understood. The evidence never takes that final step.
- **d)** **The entrance.** Stanbredges, beside the proposed access, is not assessed.

5.8 **Not justified or effective: capacity has not been tested.** The site is a narrow strip. No layout shows that 16 homes, an access road and parking can be accommodated once a significant green buffer is provided on the north and east, the hedgerow and trees are retained and building heights are restricted. The yield was more than trebled without any such work.

6. Green Belt

Soundness tests failed: not consistent with national policy; not justified; not effective.

6.1 National policy allows Green Belt boundaries to be altered only where exceptional circumstances are fully evidenced and justified (NPPF paragraph 145), and only after all other reasonable options have been examined (paragraph 147). Where release is necessary, plans should give priority to previously developed land, then grey belt, then other Green Belt (paragraph 148; the Plan's own paragraph 5.87 follows the same order). New boundaries should be defined using physical features that are readily recognisable and likely to be permanent (paragraph 149(f)).

The site-specific justification contains basic errors

6.2 The Council's justification for releasing PL1 is in the Green Belt Exceptional Circumstances Topic Paper (2026, pp.37 to 38). It:

- **a)** states that PL1 would deliver residential growth "on brownfield land". The site is a greenfield agricultural field (LAA; HIA p.66);
- **b)** rates the sub-area (PT-02) "Strong" overall, then justifies release because of "the sub-area performing moderately". That wording is identical to the entry for allocation KH2 on the previous page;
- **c)** describes Potash Lane as the eastern boundary of the site. It is the northern boundary;
- **d)** answers "No" to whether footnote 7 constraints (which include designated heritage assets) are likely to provide a strong reason for refusing or restricting development, without any reference to the Council's Heritage Impact Assessment;
- **e)** accepts that the boundaries are "not necessarily likely to be permanent" and "would require strengthening", yet Annex 6 contains no requirement to strengthen them.

6.3 A justification that misdescribes the land it releases cannot be said to be "fully evidenced and justified".

The land contributes strongly to the Green Belt

6.4 The same paper records that PT-02 meets the purpose of safeguarding the countryside from encroachment strongly, has an overall assessment of "Strong", and has "a strongly unspoilt rural character" (p.38). Releasing land that performs strongly, for 16 homes in a plan with a 958-home surplus, is not justified.

It is not grey belt

6.5 Under the NPPF (Annex 2), grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Designated heritage assets are footnote 7 assets. The Council's own heritage advice is that development here must be restricted (a significant buffer, a height restriction, retention of trees and hedges) to protect three designated heritage receptors. On the Council's own evidence the exclusion therefore applies.

6.6 The Stage 2 Green Belt Assessment identifies the land only as "provisional" grey belt (as the LAA records), leaving that check to the Council, and the Council did not carry it out properly (paragraph 6.2(d)). PL1 should therefore be treated as "other Green Belt", last in the sequence in NPPF paragraph 148 and Plan paragraph 5.87. No evidence shows why it should be preferred to other options.

6.7 **Not effective.** The Topic Paper itself says the new boundary would need strengthening, but nothing in the Plan requires it (NPPF paragraph 149(f)).

7. Best and most versatile agricultural land

Soundness test failed: not consistent with national policy.

7.1 The whole site is Grade 2 agricultural land (LAA), and the Sustainability Appraisal gives it a significant negative effect on soils for that reason (SA p.417). National policy recognises the economic and other benefits of best and most versatile agricultural land, and prefers poorer quality land where development of agricultural land is necessary (NPPF paragraph 187(b) and its footnote). The field was cropped until recent years and remains capable of food production or grazing. The Plan does not show that poorer quality land was considered.

8. Access, highway safety and accessibility

Soundness tests failed: not justified; not effective; not consistent with national policy.

8.1 Potash Lane is a single-track lane with no footways, no street lighting, blind bends and poor visibility at its junctions (Photos 8 to 12). From the north-east it is reached along Comp Lane and through the Conservation Area around the green, both one car wide. From the south-west it is reached from Long Mill Lane through a very tight turn that is difficult for cars and impractical for lorries. Both routes are already marked as unsuitable for large vehicles.

8.2 Vehicle access would be through the five-bar field gate at the south-west end, beside Stanbredges. A new access onto the lane would normally need visibility splays, which on this frontage would mean removing hedgerow that the Heritage Impact Assessment and the Landscape and Visual Appraisal both say must be kept. The evidence is therefore internally inconsistent: the mitigation for heritage and landscape harm cannot sit alongside a safe access.

8.3 There is no highway evidence for PL1. The LAA says only that potential constraints, including highways, are capable of being mitigated through "design and standard planning measures", with no assessment.

The Transport Assessment (Table 5-1, p.49) groups PL1 with the Borough Green sites and applies its most favourable assumption, a 10% reduction in car trips, without examining walking or cycling routes from this site. The nearest bus stop is about half a mile away along lanes with no footways or lighting, so in practice residents would depend on cars.

8.4 National policy requires safe and suitable access for all users (NPPF paragraph 115(b)), and development should not be allowed where there would be an unacceptable impact on highway safety (paragraph 116). Walkers on the Wealdway also use the lane (Section 9). Annex 6 contains no access or highway requirement, so the Plan gives no assurance that safe access can be achieved. Construction traffic, and any earthworks needed because of the levels (Section 4), would make matters worse.

9. Landscape, the Wealdway, the hedgerow and biodiversity

Soundness tests failed: not justified; not effective.

9.1 **Landscape.** The Council's Landscape and Visual Appraisal rates the site's landscape sensitivity as Medium to High. Even for small-scale housing, it finds Moderate Adverse landscape and visual effects, with the loss of "calm, tranquillity and rurality" (LVA Part 4, pp.634 to 636). Its only viewpoints are two points on Potash Lane at the corners of the site. It does not assess views from the listed buildings, the Conservation Area or the Wealdway, and it accepts that views would open up in winter (p.634). Its acceptance of small-scale development depends on mitigation (retaining the hedgerow and trees, careful layout and scale, new planting) that Annex 6 does not require.

9.2 **The Wealdway.** The Wealdway, the long-distance path from Gravesend to Eastbourne across the North Downs, the Weald and Ashdown Forest, passes through Platt along Potash Lane, past the site, towards Mereworth Woods. Walkers experience the field, its woodland backdrop and the listed farmstead together as one rural scene. None of the evidence considers the route.

9.3 **The hedgerow.** The Potash Lane frontage is an established hedgerow of hawthorn, blackthorn, elm, oak and ash with bramble and ivy. It adjoins agricultural land and is protected under the Hedgerow Regulations 1997. The Heritage Impact Assessment and the Landscape and Visual Appraisal both rely on keeping it, but Annex 6 does not require its retention, and the access would breach it (paragraph 8.2).

9.4 **Biodiversity.** The site adjoins mature woodland. The Sustainability Appraisal records it as within 250m of priority habitats (deciduous woodland and traditional orchard) and of ancient woodland (SA p.417). The area supports bats, badgers, roe deer, reptiles, song thrush (a priority species), tawny owl and jay, and

the field fills with wildflowers in summer. No ecological survey informs the allocation, and Annex 6 contains no ecological requirement.

10. Groundwater and drainage

Soundness test failed: not effective.

10.1 The LAA records 93.6% of the site as at risk of groundwater flooding, and all of it within Groundwater Source Protection Zone 3. The LiDAR shows the listed buildings sit 5 to 7 metres below most of the site, with the woodland rising higher still behind it. Replacing the field with buildings and hard surfaces would change how water moves across and through the slope towards the listed buildings. Annex 6 deals only with pollution of the aquifer. It contains no requirement on groundwater or surface water flood risk to the properties downslope.

11. Legal compliance: the Sustainability Appraisal

11.1 A Sustainability Appraisal is a statutory requirement (Planning and Compulsory Purchase Act 2004, section 19(5)) and must assess the likely significant effects of the Plan as proposed. For PL1, the Regulation 19 Sustainability Appraisal scores the effect on the historic environment as minor negative before mitigation (SA p.139). It then scores it as negligible once the Annex 6 criteria are taken into account (Table 6.11, p.299; method at p.297).

11.2 Annex 6 omits two of the four measures on which the Heritage Impact Assessment's own conclusion depends (paragraph 5.5). The Sustainability Appraisal therefore credits the Plan with mitigation it does not contain, and understates the effect on heritage. It is also internally inconsistent: responding to our Regulation 18 comments, the consultant described the heritage effect as significant negative (SA p.416), which matches neither the pre-mitigation score nor the final score.

12. Changes sought

Primary change: delete PL1

12.1 Delete allocation PL1 and keep the land in the Green Belt by:

- **a)** deleting PL1 from the table of allocations in Policy A1;
- **b)** deleting the PL1 entry from Annex 6;
- **c)** deleting PL1 from Annex 3 (sites to be removed from the Green Belt);
- **d)** amending the Policies Map to remove the PL1 allocation and keep the existing Green Belt boundary at Platt;
- **e)** making the consequential changes to the supply figures (Figure 5.3: 21,064 becomes 21,048) and to the figure for Platt in Figure 5.4 (16 becomes 0).

12.2 This would make the Plan sound. It would remove heritage harm the evidence does not justify, avoid an unjustified release of Green Belt land that performs strongly, protect Grade 2 farmland, and remove reliance on an access that has not been shown to be safe. The Plan would still provide 942 homes more than its requirement.

Secondary change, only if PL1 is retained

12.3 Our case is that the harm cannot be made acceptable and that PL1 should be deleted. Without prejudice to that, if the Inspector is minded to retain the allocation, the Annex 6 criteria for PL1 should at least be expanded to secure the mitigation that the Council's own evidence relies on:

a) no more than 5 dwellings (the Regulation 18 figure), located in the south-western part of the site;

b) the north-eastern part of the site adjoining the Pigeon's Green farmstead, Patchways and the Platt Conservation Area to be kept free of buildings, roads and gardens as a significant landscape buffer, with its extent shown on the Policies Map;

c) building heights restricted so that ridge heights do not exceed those of the listed farmstead group, taking account of the higher ground levels of the site, with no raising of ground levels;

d) the Potash Lane hedgerow and all boundary trees to be retained, with access shown to be achievable, with safe visibility, without their removal;

e) a highway safety assessment covering Potash Lane, Comp Lane and the Long Mill Lane junction, including pedestrians and Wealdway users, demonstrating safe and suitable access for all users;

f) a Heritage Impact Assessment following Historic England's GPA3 and the Kent Farmsteads Guidance, including the effect on Stanbredges;

g) a groundwater and surface water assessment showing no increase in flood risk to properties downslope, and an ecological survey;

h) the new Green Belt boundary to be strengthened with physical features that are readily recognisable and likely to be permanent.

13. Taking part in the hearings

13.1 We wish to take part in the hearing sessions. We are concerned residents for the area in which we live. As well as for our neighbours who live in a listed building adjoining the site and can speak directly to the ground levels, the relationship between the field and the farmstead, the condition and use of the lanes, and the hedgerow, none of which is properly reflected in the evidence. The errors in the Green Belt justification, and the gap between the Heritage Impact Assessment and Annex 6, are best tested in discussion with the Council.

Supporting documents and evidence referred to

Submitted with this representation

- This statement, including Appendix A (LiDAR readings).
- Photo sheet (12 photographs of the site, The Barn and the approach lanes).
- Our Regulation 18 letter of 11 December 2025.

Council evidence

- Regulation 19 Local Plan: Policy A1 and Chapter 14; Annex 3 (p.497) and Annex 6 (p.514); Figure 5.3 and paragraph 5.87 (Chapter 5); paragraph 8.12 (Chapter 8).
- Heritage Impact Assessments, CBA, August 2026 (ref 111491), PL1 at pp.66 to 67 and site plan.
- Heritage Impact Risk Assessments, October 2025, pp.9 to 10.
- Green Belt Exceptional Circumstances Topic Paper, 2026, pp.37 to 38 (PL1 and sub-area PT-02).
- Sustainability Appraisal, Regulation 19 (LUC), pp.139, 297 to 299 and 416 to 417.
- Land Availability Assessment 2026, Site Assessments Part 2 (site 59617).
- Landscape and Visual Appraisal, Part 4 of 5, pp.632 to 636 (site 59617).
- Local Plan Transport Assessment, August 2026, Table 5-1 (p.49).
- Development Allocations: justification for updates between Regulation 18 and Regulation 19, p.6.

National policy, guidance and data

- National Planning Policy Framework, December 2024: paragraphs 115(b), 116, 145, 147, 148, 149(f), 187(b), 212, 213, 215, 216, and the Annex 2 definition of grey belt.
- Historic England, GPA3: The Setting of Heritage Assets (2nd edition, 2017).
- Historic England, Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015).
- Kent Farmsteads Guidance (2014).
- National Heritage List for England: entries 1362058, 1072678, 1072677 and 1072697.
- Hedgerow Regulations 1997.
- Environment Agency, LiDAR Composite Digital Terrain Model, 1m.

Appendix A: LiDAR ground-level readings

Source: Environment Agency LiDAR Composite Digital Terrain Model, 1m resolution (bare earth, excluding buildings and vegetation), read from the Environment Agency's public map service on 23 October 2026. Reading positions were located on the PL1 site plan in the Council's Heritage Impact Assessment (August 2026), fixed to the National Heritage List positions of Patchways, The Barn and Pigeon's Green Farmhouse; positional accuracy is about plus or minus 5 metres. Readings for the listed buildings are the ground level at each building's National Heritage List point. "Distance" is measured from The Barn along the length of the site. Centre, south-east and north-west readings are within the site; woodland readings are just beyond its south-east edge.

Ref	Location	Distance (m)	Latitude	Longitude	Ground level (m)
1	The Barn (Grade II)	0	51.286296	0.328802	103.77
2	Patchways (Grade II)	-	51.286343	0.328303	103.08
3	Pigeon's Green Farmhouse (Grade II)	-	51.286263	0.329256	104.95
4	Garden of The Barn	13	51.286175	0.328802	103.91
5	Site, centre	31	51.286021	0.328757	106.79
6	Site, south-east side	31	51.285965	0.328836	107.52
7	Site, north-west side	31	51.286077	0.328678	106.07
8	Woodland edge	31	51.285864	0.328980	108.55
9	Site, centre	47	51.285905	0.328548	108.61
10	Site, south-east side	47	51.285849	0.328627	109.41
11	Site, north-west side	47	51.285960	0.328469	107.74
12	Woodland edge	47	51.285748	0.328771	110.50
13	Site, centre	65	51.285788	0.328339	109.54
14	Site, south-east side	65	51.285732	0.328418	110.48
15	Site, north-west side	65	51.285844	0.328260	108.73
16	Woodland edge	65	51.285631	0.328561	111.85
17	Site, centre	84	51.285672	0.328129	109.94
18	Site, south-east side	84	51.285616	0.328209	110.62
19	Site, north-west side	84	51.285727	0.328050	109.24
20	Woodland edge	84	51.285515	0.328352	112.01
21	Site, centre	103	51.285555	0.327920	109.99
22	Site, south-east side	103	51.285499	0.327999	110.61
23	Site, north-west side	103	51.285611	0.327841	109.42
24	Woodland edge	103	51.285398	0.328143	111.88
25	Site, centre	122	51.285439	0.327711	110.16

Ref	Location	Distance (m)	Latitude	Longitude	Ground level (m)
26	Site, south-east side	122	51.285383	0.327790	110.84
27	Site, north-west side	122	51.285494	0.327632	109.74
28	Woodland edge	122	51.285282	0.327933	112.12
29	Site, centre	141	51.285322	0.327502	110.13
30	Site, south-east side	141	51.285266	0.327581	110.67
31	Site, north-west side	141	51.285378	0.327423	109.75
32	Woodland edge	141	51.285165	0.327724	111.92
33	Site, centre	160	51.285206	0.327292	109.97
34	Site, south-east side	160	51.285150	0.327371	110.51
35	Site, north-west side	160	51.285261	0.327213	109.69
36	Woodland edge	160	51.285049	0.327515	111.78
37	Site, centre	180	51.285089	0.327083	109.69
38	Site, south-east side	180	51.285033	0.327162	110.16
39	Site, north-west side	180	51.285145	0.327004	109.32
40	Woodland edge	180	51.284932	0.327306	111.50