

Main Modifications Consultation Capel Parish Council comments.

Although Capel Parish Council welcomes the deletion of Tudeley GV from the submission Local Plan and the reduction of housing numbers in land west of Paddock Wood/east Capel, we continue to be concerned about the scale of proposed development in our parish and the consequent loss of Green Belt land. We are concerned that the flood mitigations suggested in SS/STR1A and 1B will not be adequate and that the necessary infrastructure will not be provided in a timely manner to enable the creation of coherent self-sustaining communities, and to prevent further damage to the amenity of existing residents. We thus continue to oppose the development west of Paddock Wood/east Capel but have engaged in this consultation process in the hope of further mitigating its impact on our residents.

MM number	Issue	Comment and justification
10, 11, 12, 79, 84 and throughout	Deletion of Tudeley village	<p>The deletion of TGV from the 'Vision' [MM10] is welcome. This will enable the forthcoming review of the plan to start from a level playing field and without prejudice.</p> <p>The deletion of Tudeley village [MM84] is to be welcomed. This is in line with the Inspector's initial letter as there are no very special circumstances to remove the large area of land required from the Green Belt. Given that this plan also envisages building c.1030 homes in east Capel, an even larger development in Tudeley would have put unacceptable extra pressure on road and other infrastructure within the parish.</p> <p>It is noted that planning application 22/03563/FUL consented on 5th March 2024 crosses the intended route of the 'Five Oak Green bypass' without which any development in Tudeley would not be tenable.</p>
MM17	Development Strategy	<p>The reduction in housing numbers for east Capel to 997-1063 units is welcomed. However, we point out that this is still over 100% increase in the number of dwellings in this parish and that the community and road infrastructure is not adequate to cope with this level of increase without early mitigation. We remain to be convinced that flood alleviation measures are sufficient particularly in STR/SS 1(B).</p>

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MM20/21	STR 4 Ensuring Comprehensive Development	INSERT: The Masterplan (SPD) for STR/SS1 should be produced and fully consulted on. The process will involve key stakeholders, including Paddock Wood Town Council and Capel Parish Council. It will be agreed before consideration of any planning applications on SS/STR1 to avoid piecemeal development, and to ensure the creation of coherent communities with the necessary infrastructure to support them.
MM25	STR 6 Transport and Parking	<p>(b 1) We welcome the reference to planned rapid bus/transport links especially between Paddock Wood and Tonbridge. It will be essential to connect any new development with its surroundings and to link the village of Five Oak Green with any new development within the parish of Capel. This should be reflected in the forthcoming planning applications for STR/SS 1(A) and (B).</p> <p>c) These highway improvements will need to be delivered at an early stage of the development especially the improvements to Badsell Roundabout, the Colts Hill bypass and traffic management works in Five Oak Green. The latter should include both the B2017 and Whetsted Road which runs from the A228 across a narrow railway bridge into the centre of Five Oak Green. Indicative plans for SS/STR1(A) indicate a junction in the new development close to the A228/Whetsted Road junction – potentially exacerbating the already existing ‘rat running’ problem.</p>
MM27	Green Belt	217.242 ha (3.046%) of the Green Belt in Tunbridge Wells Borough is to be removed; 148.194 ha (2.077%) of this is in Capel parish (68.18% of the total). While less than originally intended it has a huge and disproportionate effect on one parish. The compensatory addition is only 1.084 ha (0.015%) of the total.
MM28	Policy STR 9 Green Belt	Agreed this should reflect the NPPF to more effectively protect remaining MGB land.
MM79	Strategic Sites	Para 5.160 refers to ‘land to the West of the proposed extension, <u>the majority of which is in Capel</u> ’ – we support the explicit recognition of the

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		<p>geographical reality – this should mean that mitigation and other measures should benefit Capel Parish residents as well as those in Paddock Wood.</p> <p>Para 5.188 support ‘will need to incorporate renewable energy generation’ reflects the view of the Capel Neighbourhood Plan</p> <p>Para. 5.189 Colts Hill bypass: we support the modification - but the plan also needs to be more explicit about the need to deliver this before first occupation of sites around Paddock Wood/east Capel.</p> <p>Para. 5 193 after relevant key stakeholders insert ‘<u>including Paddock Wood Town Council and Capel Parish Council</u>’... [to make it clear to developers]</p>
MM 80	Policy STR/SS1	<p>Development principles: <i>c) be landscape led and of a high standard of design with particular attention to be paid to structural and detailed landscaping (to promote and deliver a continuous and homogeneous landscape approach to the allocation as a whole). This should include the retention and enhancement of hedges and trees along the A228 with development set back from A228 to reduce visual impact on the countryside, INSERT: <u>and the wider impact on the residential amenity of existing properties on the boundaries of the northwest and southwest parcels...</u></i></p> <p>15. Infrastructure to be funded shall include:</p> <p>a) add after sports facilities ‘<u>and land for allotments</u>’ (<u>which should be on land within Capel Parish</u>) [to reflect the potential demand generated within Capel by the new development]</p> <p>(e) Add: under Improvements to the highway:</p> <p><u>v) Works to the B2017 through Five Oak Green and Whetsted Road between the A228 and Five Oak Green</u> [to be consistent with MM25]</p> <p>Policy STR/SS1(A) Development principles Northwestern Parcel Requirements</p>

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		After (iii) a three-pitch gypsy/traveller site (to include space for one mobile home and one touring caravan per pitch) in accordance with policy H9; INSERT: to be situated away from the A228 [for highway safety: to ensure the site is not accessible to 'trotter racing' along the A228 (which has a long history of this illegal practice)]
MM90	Section 5: Capel	Para 5.262: a misprint: presumably 'land at east Capel' is no longer intended to be in the Green Belt? Para 5.265 Insert after: 997-1063 homes within Capel parish... <u>which reflects more than a doubling of the existing 953 homes within the parish</u> [to evidence the need for contributions to enhancing community facilities]
MM 91	STR/CA1 Policy for Capel Parish	Policy STR/CA1: Capel Parish Council welcomes the strengthening of this policy but thinks its requirements need to be made more explicit, especially in the requirement to cater for existing residents outside SS/STR1 to ensure they are not disadvantaged by the development within the parish boundary. 4. Compensatory improvements to the Green Belt... needs to be exemplified as the only explicit reference found was to 1.084 ha of new GB land outside the site. 6b open space, sports, INSERT: <u>allotments</u> and recreations facilities, <u>INSERT: within both the east Capel development and the wider parish.</u> 6c other necessary mitigation measures, INSERT: <u>including but not limited to contributions to a new/refurbished village hall (the need for which has been identified by Capel Parish Council and is supported by the Capel NDP)</u> , which are directly related to the development and fairly and reasonably related in scale and kind.
MM 250	Section 6: Safeguarding Roads	Paragraph 6.577

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	 as detailed in Policy STR 6: Transport and Parking, a part off-line new section of highway running to the north of a collection of houses along the A288 the properties 1, Colts Hill Place to 'Braemar' to the west, and Spring Farm to Crittenden Cottage to the east, along the A228.
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