

## ***Capel Parish Council comments on the changes to the SLP consultation***

### **Proposed removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village from the Local Plan**

**Capel Parish Council welcomes the removal of STR/SS3 from the Submission Local Plan in line with the Inspector's Option 3. As anticipated TWBC cannot produce the evidence to justify the removal of the site from the Green Belt.**

Clearly the proposal would have inflicted an unfair burden on the residents of neighbouring Tonbridge and Malling particularly Tonbridge town centre, which already experiences severe traffic problems in its road network which dates to its Medieval origins. 2800 new homes just beyond its boundary would undoubtedly have worsened this situation and it is unsurprising that the SLP would have continued to have experienced opposition from officers, elected members and adjoining residents.

The proposed Five Oak Green bypass, a last minute addition to the SLP before Regulation 19, did not demonstrate the exceptional circumstances which would have justified its removal from the MGB. The landscape impact on the adjoining AONB had not been assessed and the timing and costs would have been uncertain.

The landowner was clearly incapable of building the number of houses required on the site by the Plan, and as this was the basis of the exceptional circumstances required to remove the site from the MGB, then the site's continuation in the Plan was untenable.

The Capel Parish Council also were unconvinced by TWBC's transportation studies and viewed a modal shift towards public transport and cycling as unlikely given the unsustainability of the site and the limited road network, the upgrading of which would have led to years of disruption for parish residents.

### **Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel, including a reduction in the amount of residential housing growth by approximately 1,000 dwellings, with all housing being on Flood Zone 1 and employment land on Flood Zone 2**

**Capel Parish Council remain opposed to the removal of land in East Capel from the Metropolitan Green Belt. Although the council welcomes the reduction in housing numbers and the removal of proposed housing from fluvial Flood Zones 2 and 3 within East Capel, it still considers this part of the plan to be unsound on flooding and transportation grounds.**

#### **1. Flooding –**

the council has responded to the Inspector's comments on fluvial flooding by removing all housing development from Flood Zones 2 & 3, but the issue of groundwater flooding remains. This is a particular concern in the NW of the site along the A228 opposite Whetsted, where a substantial proportion of the 717 homes in this quadrant are to be built. The flood zone modelling looks at fluvial flooding from the Tudeley Brook and other streams to the west of Paddock Wood, but groundwater flooding has also been a particular issue to the east of the A228 particularly in the north of STR/SS 1(A). As groundwater levels are high, the opportunities to mitigate flood risk through provision of attenuation is reduced reinforcing the significant constraints to developing in and around the site. For example, the

proposal includes construction of SUD's and alleviation ponds further north in the site – whether these will be sufficient to justify building is not clear on the evidence the council has provided. The drop in ground level between the site of STR/SS 1 and the Medway is minimal and it is difficult to see where ground water and surface water from this area will go. The fear is it will go downstream to communities already threatened by flooding, for example Yalding.

In the western quadrant STR/SS 1 (B) the two slithers of land to the east and west of the Tudeley Brook are small islands surrounded by flood zones 2 and 3 and would be isolated in flood periods. This is the lowest part of Capel Parish and has flooded frequently in the recent past and would become increasingly vulnerable in a time of climate change. While it is anticipated that most of the 514 properties in this sector will be accommodated immediately to the west of Paddock Wood, the remainder of this sector would be much more threatened by flooding and should be excluded from the development.

**The conclusions of Motion the Consultants engaged by Capel Parish Council and Save Capel are:**

- a) The existing surface water network around Paddock Wood was judged to be at capacity in the PW Flood Alleviation Study 2015, and nothing has been done to address this since.**
- b) The EA's sequential test for development in the allocation of the school site in Flood Zone 2 has not been satisfied.**
- c) Many of the residential units in the west of the site within East Capel allocated within Flood Zone 1 are surrounded by land in Flood Zones 2 and 3 and safe access and egress to these sites has not been addressed. This situation is expected to worsen with climate change. Given this it is open to question whether there is sufficient land available for the quantum of housing proposed.**

**2. Road network and junctions –**

The development of c. three thousand homes east of Paddock Wood and in East Capel/land west of Paddock Wood will have a serious impact on traffic in Capel Parish, and more broadly west of Paddock Wood. It is also unclear what the impact of this would be on the A228 north and south or on the surrounding rural roads, including through Five Oak Green, and this raises serious health and safety concerns given the above average current accident record. For example, the B2017 through Five Oak Green, would need to be adapted to cater for (i) safe movement of pedestrians and cyclists (ii) Public transport and (iii) growth in traffic arising from the quantum of development. There is no provision in the plans for this and thus, based on the evidence (not) provided, it would place an undue burden on this arterial route (and thus on residents of Five Oak Green).

Capel Parish Council has no objection to the proposed lower Colts Hill bypass running from an improved junction at Badsell Road to a roundabout at Alders Road but considers this already necessary without the increased traffic generated from STR/SS1. We believe that a scheme for the Colts Hill bypass must have permission and funding in place before the start of any development established by policy STR/SS1.

3. **Modal Shift –**

The numbers proposed are being justified in terms of a modal shift in travel. The council suggest there will be a ‘figure of eight’ bus service that will encourage internal journeys and alternatives to the car. This will be paid for by S.106 developer money which will need to be attractive enough to build up a clientele before the money runs out. The evidence for this is unconvincing in an area that suffers from poor public transport links. There is not even a proposal to connect the internal bus service to Five Oak Green and Tonbridge (where at present there is no evening or weekend service beyond Saturday midday).

It is claimed that cycle lanes and walking routes are also being prioritised. The evidence provided for this is unconvincing. Given the existing road infrastructure, it is difficult to believe that journeys by foot or cycle will be conducted in any meaningful way outside the boundaries of the proposed new developments. (At present there is not even a safe walking route from Five Oak Green to Paddock Wood centre along or nearby the B2017). In other words, residents will continue to be dependent on the car for travel outside this area.

**The conclusions of Motion, the Consultants engaged by Capel Parish Council and Save Capel are:**

- a) **The masterplan for PW / EC requires significant infrastructure interventions and there is insufficient evidence to demonstrate that there is a reasonable opportunity of these being deliverable.**
- b) **The offsite travel network does not meet minimum design recommendations and relies on infrastructure that may well not be provided.**
- c) **The public transport strategy is not sustainable as it relies on an in perpetuity subsidy which cannot be secured.**

4. **Non transport Infrastructure –**

It is important that if the planned housing is built Infrastructure be put in place before any properties are occupied. This includes, for example, an expanded Woodlands Health centre, a new pharmacy, and educational provision. We cannot see how this will happen from the evidence before us.

5. **Expansion of Paddock Wood –**

TWBC and some of the developers see this proposal very much as an expansion of Paddock Wood though most residents will live in Capel and pay their Council tax there. Any residents of the NW sector along the A228 will live closer to Five Oak Green than Paddock Wood. This is only separated from the hamlet of Whetsted by the road, (which divided the settlement in the 1980's) so the NW proposal should be seen more as an expansion of that settlement within Capel Parish. Any housing built in the west of STR/SS 1(B) would be in easy walking distance of Five Oak Green which would be much closer and more accessible by foot than Paddock Wood.

Planners do not see community identity as a planning issue, but the new residents will be entitled to use the community facilities in Capel, as an example the Parish Council will have to make provision for allotments for new residents. It is important that the section on Capel Parish in the SLP (CA1) be reviewed, as a matter of urgency, in the light of whatever is agreed and the Parish Council strongly insist that money for allotments, community and leisure facilities be supplied to the parish through S106 including land within the allocation, and that any development within Capel Parish should conform to the Capel Neighbourhood Plan and Design guidance, which is likely to be ‘made’ well before the SLP is adopted by TWBC.