



**Representations of Save Capel (“SC”) on the Public Consultation  
on the proposed Main Modifications to the Tunbridge Wells Borough Council (“TWBC”) Pre-Submission  
Local Plan under Section 20(7c) of the Planning and Compulsory Purchase Act 2004 and Part 6 (Section 20)  
of the Town and Country Planning (Local Planning) (England) Regulations 2012**

Tuesday, 29 April 2025

*‘Save Capel’ is an unincorporated association and the property of its members, who elect the Executive. Its purpose is to protect the parish of Capel from the threat of disproportionate development and to protect the ‘Metropolitan Green Belt’ (MGB) and ‘High Weald National Landscape’ (formerly AONB) within the parish. Save Capel has never been against sustainable development and has always said the right type of development in the right place was acceptable.*

*FOREWORD*

*Save Capel strongly supports and welcomes the deletion of Tudeley Garden Village from the Local Plan. The reduction in housing numbers at east Capel is also welcome, though we continue to oppose any development at east Capel due to material remaining concerns over the use of Green Belt land at flood risk, the increased size of Paddock Wood given inadequate existing infrastructure, and the likelihood that infrastructure enhancements will follow rather than precede housing growth.*

*Our response to the proposed main modifications is set out below. This includes suggested changes that Save Capel considers are needed for the effectiveness of the proposed Local Plan having engaged in this consultation process in the hope of further mitigating its impact on Capel's residents. Save Capel continues to argue that the Plan is unsound for the reasons set out through the examination and these representations should not be taken as any endorsement or support of it.*

MM number	Proposed Main Modification	Comment and justification
MM1	<p>Paragraph 1.6</p> <p>The Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 was originally adopted by Kent County Council in July 2016 and was subject to an Early Partial Review of certain waste management capacity requirement and mineral and waste safeguarding policies. The Plan was adopted in its modified form in September 2020. The KMWLP has since been subject to further review and several public consultations. It is currently subject to examination and will replace the 2020 version of the KMWLP.</p>	<p>The revised KMWLP was adopted in March 2025 and before this consultation. This paragraph should be revised accordingly to refer to the current Minerals &amp; Waste Plan 2024-2039.</p> <p><a href="#">Kent Minerals and Waste Local Plan 2024-39 - adopted March 2025</a></p>
MM10	<p>Section 3: Vision</p> <p>Delete paragraph 3.13</p> <p><del>Finally, in terms of facilitating sustainable growth, consideration also needs to be given to the prospect of a new settlement, as this was well supported when the principle was mooted at the Issues and Options stage and is considered necessary to meet identified housing needs in a sustainable way. Therefore, while the proposed location has been subject to much local opposition, it remains a component of the Vision.</del></p> <p>Delete third bullet point of the Vision:</p> <p><del>for a garden settlement, to establish the potential for a new village to contribute to sustainable growth, that is: based on garden settlement principles; comprehensively planned and reflecting local character; well connected with nearby towns; providing local job opportunities, services and all necessary supporting infrastructure; with exemplary development of sustainable design;</del></p>	<p>SC strongly supports these deletions as Tudeley Village has always been an unsustainable proposal. Whilst SC has supported the ‘vision’ of a garden settlement the Council could (and should) have properly assessed other sites it had identified that may have provided such an opportunity.</p> <p>SC provided a comprehensive report on alternatives back in 2019 and looks forward to working with the Council as part of the ‘early review’ necessitated by the Council’s response to the Inspector’s findings.</p>

MM14	<p><i>Update Table 3: Housing Need and Supply 2020-2038</i></p>	<p>The table of Housing Need and Supply 2020-2038 contains basic factual / numeric data as at 1 April 2023. This is stated as being the latest available data.</p> <p>SC notes the Inspector's directions in respect of avoiding un-necessary revisions to the housing trajectory. However, it would be helpful if a summary of the actual data for one year ago - 1 April 2024 - is provided with a brief commentary to assist users of the Plan.</p>
MM15	<p>Section 4: Formulating the Development Strategy</p> <p>After paragraph 4.35 add A key evidence document is the Council's 'Settlement Role and Function Study'. This groups settlements in terms of their characteristics, focusing on the range of services and facilities they currently provide.</p> <p>Delete paragraph 4.47 <del>Tudeley Village would involve the loss of a large area of Green Belt but is outside the AONB, is well located in terms of accessibility to nearby towns, would be of a scale that supports a good range of services, and can be planned in a holistic, comprehensive manner, achieving very high standards of sustainable design and development. Moreover, no sustainable option has been identified and, without this new settlement, the borough's housing need would not reasonably be capable of being met.</del></p>	<p>SC agrees that for effectiveness and to clarify the role/function of settlements some form of scoring system should be used, however this must be up to date at all times for both justification and soundness. In the case of Five Oak Green incorrect data has consistently been used.</p> <p>SC agrees with the deletion of this paragraph 4.47.</p> <p>However, for consistency and effectiveness we consider Paragraph 4.43 should be amended as follows:</p> <p><i>It is found that, even promoting all suitable SHELAA sites for allocation in the Local Plan, the borough could meet only a fraction of its housing need without the provision for strategic sites. , namely the substantial expansion of Paddock Wood (including land at east Capel) and the creation of a new garden settlement at 'Tudeley Village'. With these proposals, the Local Plan can meet the housing need in line with the NPPF's standard method.</i></p>

	<p>After paragraph 4.49 add the following new paragraphs</p> <p>Following the deletion of Tudeley Village, the adopted Local Plan does not provide for the full housing needs up to 2038. As such the Council is committed to an early review of the Plan to seek ways of meeting unmet housing needs in the later part of the Plan period. All other policies included in the Plan remain applicable for the entire plan period 2020-2038.</p> <p>As part of this early review the Council will identify and assess reasonable options for meeting unmet housing needs, and without prejudice to any decisions made about a future development strategy to meet this unmet need, will consider all reasonable sites put forward through a 'Call for Sites' and other land identified by the Council to be assessed as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) process.</p>	<p>SC considers that the following revision would be clearer and more effective:</p> <p><i>Following the deletion of Tudeley Village <u>(proposed in the Draft Local Plan) and the need to restrict the expansion of Paddock Wood to avoid higher flood risk areas</u>, the adopted Local Plan does not provide for the full housing needs up to 2038.</i></p> <p>SC finds it unclear what is meant by “without prejudice..” and considers this modification is not justified. We suggest the following:</p> <p><i>As part of this early review the Council will identify and assess reasonable options for meeting unmet housing needs, <del>and without prejudice to any decisions made about a future development strategy to meet this unmet need,</del> will consider all reasonable sites put forward through a 'Call for Sites' and other land identified by the Council to be assessed as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) process.</i></p>
MM16	<p>Policy STR 1 The Development Strategy Opening Paragraph:</p> <p>The strategy of this plan provides for a housing supply for the first 10 years of the plan period with employment and other development including necessary supporting infrastructure, but with a requirement for an early review of the plan to include ways of meeting identified unmet needs.</p>	<p>SC highlighted at the hearings that the use of 'plan period' is misleading. The housing supply relates to the 10-years “post-adoption” and not from 2020 and suggests:</p> <p><i>The strategy of this plan provides for a housing supply for the first 10 years <u>after its adoption (i.e., to 31 March 2035)</u> <del>of the plan period</del> with employment and other development including necessary supporting infrastructure, but with a requirement for an early review of the plan to include ways of meeting identified unmet needs.</i></p>

	<p>3. Provides for the growth of settlements, having regard to their role and function, constraints, and opportunities, together with the major, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions</p> <p>4. <del>Includes an allowance for potential delays or non-delivery of sites;</del></p>	<p>SC considers that ‘sustainable and proportionate’ should be added amongst the adjectives in para 3.</p> <p>SC questions why this policy has been removed. The examination has heard extensive representations on the risks of the strategic site housing trajectory and it is concerning if no allowance has been incorporated. The soundness depends on SS1 delivery to achieve a 10-year housing supply post-adoption.</p>
MM17	<p>Section 4: Development Strategy <i>Update Table 4: Distribution of housing allocations</i></p> <p>Paragraph 4.54 ...are robust, such that the Council is confident that a 10-year housing land supply can be achieved post-adoption. The Council will then aim to meet the needs beyond the 10-year supply period by way of an immediate Local Plan review.</p>	<p>SC reminds the Inspector of the inconsistency of “early” and “immediate” in the policy wording. We suggest deleting the final sentence of Para 4.54 as it is already set out above in the MM15.</p>
MM20	<p>STR 4 Ensuring Comprehensive Development</p> <p><i>Amend last sentence of paragraph 4.76 as follows:</i> A Masterplans, <del>in the form of SPDs;</del> will be required for the urban expansion of Paddock Wood (including land at east Capel) <del>and the new garden settlement at Tuddeley Village</del></p>	<p>SC is unclear why the reference to a Masterplan being required is followed by the struck-out words “in the form of SPDs” whilst in the following MM21 an SPD will be used?</p>

MM21	<p>Policy STR 4 Ensuring Comprehensive Development Amend third paragraph of Policy STR 4 as follows:</p> <p>To ensure holistic and fully integrated approaches to the strategic developments proposed in this Local Plan, <del>a masterplans</del> for the urban expansion of Paddock Wood (including land at east Capel) <del>and Tudley Village</del>, will take the form of <del>a</del> Supplementary Planning Documents.</p>	<p>SC understands that SPDs have been removed from the development plan for the strategic sites. For consistency we suggest:</p> <p>To ensure holistic and fully integrated approaches to the strategic developments proposed in this Local Plan, <del>a</del> masterplan for the urban expansion of Paddock Wood (including land at east Capel) <u>will be required as set out under policy STR/SS 1.</u></p>
MM23	<p><b>Policy STR 5 Infrastructure and Connectivity</b></p> <p><i>Second paragraph of the Transport section of Policy STR 5 as follows:</i></p> <p>The Council's Infrastructure Delivery Plan will support the growth in the Local Plan. <b>The Infrastructure Delivery Plan has been updated to reflect <a href="#">DfT Circular 1/22</a> (Strategic road network and the delivery of sustainable development, updated December 2022) to outline the required Vision and Validate/Monitor and Manage requirements.</b></p>	<p>SC notes the updated IDP which has not been subject to this public consultation.</p> <p>The hearings in 2024 included the suggestion by the Council of a “Delivery Board” to control development but SC is unable to find reference to this in the MMs.</p> <p>It is essential for public scrutiny of this “Monitor &amp; Manage” approach and SC wishes to participate as set out below in this representation.</p>
MM25	<p>Policy STR 6 Transport and Parking</p> <p><i>In point 2 of Section a) Active Travel</i></p> <p><i>The development and delivery of the strategic sites (Paddock Wood and east Capel, <del>and Tudley Village</del>) proposed in this Local Plan will have integrated active travel as a fundamental element to their layout and design, so that settlements are easy to navigate on foot or by bike, both in new development and through existing areas of settlements to access their centres and services</i></p>	<p>Please add Five Oak Green as an area within the integrated active travel plans for the East Capel development and to Mascalls/New School.</p> <p>The new Badsell Road development, opposite Mascalls, is now part of Capel and no longer Paddock Wood following the recent boundary changes.</p>

	<p>Amend section c) Highway network</p> <p>The Council will work with Kent County Council and Highways England National Highways through the agreed Monitor and Manage strategies to oversee the delivery of strategic and local highway improvements... A full list of the envisaged/potential mitigation measures are provided in the Infrastructure Delivery Plan, but include:</p> <ol style="list-style-type: none"> <li>part off-line, part on-line Colts Hill Bypass and associated improvements at Badsell Road Roundabout to the A228, as shown on the Policies Map;</li> <li><del>the provision of a highway link bypassing Five Oak Green, as shown on the Policies Map</del> Somerhill Roundabout improvements;</li> <li>Traffic management improvements at Five Oak Green Village;</li> <li>Hop Farm Roundabout improvements;</li> <li>Junctions on the Pembury Road corridor including measures along the A228/A264, including junction capacity improvements at Woodsgate Corner and a roundabout an appropriate junction at the Pembury Road/Halls Hole Road/Blackhurst Lane.</li> </ol>	<p>SC welcomes the inclusion of these improvements which are essential mitigations for the strategic sites and considers that the words “envisaged/potential” should be removed from this policy wording.</p> <p>SC therefore welcomes the use of “necessary” in the IDP which confirms our position under para 3.22 as follows:</p> <p><i>The following highway mitigation measures have been identified as necessary to support the proposed growth in the Local Plan:</i></p> <ul style="list-style-type: none"> <li>• Colts Hill Bypass / Badsell Road roundabout improvements, linking Badsell Road roundabout junction with Colts Hill (A228 / B2017) with a new bypass road going south to the junction of Alders Road and Crittenden Road</li> <li>• Somerhill Roundabout Improvements B2017/A26.</li> <li>• Hop Farm Roundabout Improvements B2160 / A228</li> <li>• Five Oak green traffic management/speed reduction measures along B2017</li> <li>• Pembury Road corridor improvements between Woodsgate Corner and Sandhurst Road : <ul style="list-style-type: none"> <li>- A228 Pembury Road / Tonbridge Road (Woodgate Corner)</li> <li>- A228 Pembury Road A21 flyover South West Dumbbell</li> <li>- A264 Pembury Road / Hall’s Hole Road</li> <li>- A264 Pembury Road / Sandhurst Road</li> </ul> </li> </ul>
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MM25	<p><i>Amend section c) Highway network</i></p> <p>i. part off-line, part on-line <b>Colts Hill Bypass and associated improvements at Badsell Road Roundabout to the A228</b>, as shown on the Policies Map;</p>	<p>For the sake of heritage, clarity and specifically not to confuse with the PW end of Badsell Road, this roundabout is called <b>Dampiers Corner</b> – not Badsell Road roundabout or Colts Hill Roundabout</p>
MM34	<p>Strategy for Royal Tunbridge Wells (RTW)</p>	<p>SC welcomes the Council's intention to incorporate new housing in Royal Tunbridge Wells, including the Royal Victoria Place shopping centre and the other centrally located sites identified, because new housing should be located near to existing essential public services.</p>
MM79	<p>Delete paragraph 5.190</p> <p><del>Notwithstanding the general principle that the overall strategic growth warrants these highway and related improvements, highway modelling shows that the growth at Tudeley Village (and to a more limited extent that at Paddock Wood and east Capel) would increase traffic through Five Oak Green...</del></p>	<p>SC agrees with the deletion of this paragraph.</p> <p>However, for consistency and effectiveness we consider the following paragraph (SLP 5.191) which refers to “contributions being refined in SPDs” is no longer the case.</p> <p><i>SC suggests the following change to para 5.191:</i></p> <p><i>The assignment of contributions will be further refined through the <del>Supplementary Planning Documents</del> <b>Masterplans</b> to be prepared for each Strategic Site <b>parcel</b>. The delivery of this infrastructure should be through ongoing discussions with relevant stakeholders. This includes, but is not limited to, Kent County Council, adjacent local planning authorities (Tonbridge &amp; Malling and Maidstone Borough Councils) and other statutory consultees.</i></p> <p>Revisions to Para 5.193 refer to “masterplans” replacing the need for SPDs.</p>

MM81	<p>Policy STR/SS 1</p> <p>2. The development proposals for the whole of the allocated area shall embed garden settlement principles. Proposals for each Parcel should give effect to this requirement and be informed and guided by the...</p> <p>3(d) states “ensure that the development responds appropriately to local character and overall setting”</p> <p>3 (h) states “ensure that surface water runoff from the development will not exacerbate and so far as possible and practicable improve flooding elsewhere”;</p>	<p>SC considers that the original SLP cross-reference to the supporting text should be kept, as follows:</p> <p><i>“The development proposals for the whole of the allocated area shall embed garden settlement principles, <u>as outlined in the supporting text above [para 5.187]</u>”.</i></p> <p>SC is concerned there is no policy requirement that safeguards the privacy and amenity of existing residents in Whetsted and around Eastlands in particular. SC would expect adequate buffers and landscaping to be required for all adjacent properties, whilst noting the adjacent/nearby heritage assets and their setting. Policy 3(d) should be enhanced accordingly.</p> <p>The SLP (#13) included the requirement for a Drainage Strategy which SC considers should be re-instated under new Policy 3(h), with the following amendments:</p> <p><i>“Ensure a drainage strategy is in place, in consultation with the Local Planning Authority, Kent County Council as the Drainage Authority, and Southern Water prior to the grant of planning permission for any <del>substantial</del> development on the site, <del>unless exceptional circumstances arise</del>. This should demonstrate that there is adequate capacity in the foul sewage network, and that development will not exacerbate flooding elsewhere. The drainage strategy should be implemented through the development to deliver the levels of storage, attenuation, and mitigation measures to reduce the incidence of flooding to adjacent residential areas in Paddock Wood <u>and Capel</u>”.</i></p>
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	<p>3(k) states “is developed with Vision and Validate/Monitor and Manage principles and provides walking and cycling linkages within and between each Parcel, together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with Policy TP2;</p> <p>5. Planning applications for development should be informed by appropriate landscape and visual impact assessments, biodiversity and heritage studies where necessary.</p> <p>6. All development proposals shall be assessed by a Design Review Panel at the pre-application and application stages.</p>	<p>SC considers that connectivity/active travel measures between Five Oak Green, East Capel, and Paddock Wood are essential with a means for safe crossing of the A228 for pupils to any secondary school location. The IDP identifies at 3.69 page 38 a cycle route between PW and Capel but no mention of a how the A228 would be traversed.</p> <p>SC suggests the following revision to 3(k):</p> <p><i>is developed with Vision and Validate/Monitor and Manage principles and provides walking and cycling linkages within and between each Parcel, together with links to Paddock Wood town centre, <b><u>Five Oak Green (with the provision of a safe crossing on the A228)</u></b>, existing and new employment areas, and surrounding countryside in accordance with Policy TP2;</i></p> <p>SC notes IDP Page 42 Table: “Pedestrian/Cycle route between Paddock Wood and Capel village”. This should be to Five Oak Green.</p> <p>SC considers that the text “...where necessary” should be removed from this policy. These assessments should be a requirement of the policy which already mentions ‘appropriate’.</p> <p>SC is unaware of any legal or other definition of “Design Review Panel” and is concerned with the resulting lack of clarity on governance. It would be helpful to include a supporting paragraph on how this body is constituted: who will be its members, what will be its mandate, what will be its decision criteria; what will be its meeting frequency and how transparently will it report its decisions to the public? Also, will it include members of the local community / ensure local community engagement?</p> <p>The Council referred to a ‘Delivery Board’ at the hearings in 2024, then we have a ‘Transport Review Group’ in the IDP and now the ‘Design Review</p>
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	<p>9(a) show the intended overall design and layout of the development and the proposed distribution and location of uses across the Parcel including its functional links with neighbouring Parcels, the existing community of Paddock Wood and Paddock Wood Town Centre and surrounding land which shall accord with, be based upon and promote, garden community principles as required in paragraph 2 above;</p> <p>9 (b) demonstrate how heritage assets and their settings will be sympathetically integrated into the development and their significance respected;</p> <p>9(g) provide convenient and highly legible pedestrian and cycle links through the allocated site to connect the Parcels and integrate the new communities and provide good pedestrian access to Paddock Wood Town Centre and surrounding areas;</p> <p>9 (j) where land has been removed from the Green Belt the masterplan shall demonstrate how compensatory improvements will be provided.</p>	<p>Panel'. It is essential that there is effective community engagement with the masterplanning of this sensitive growth area. SC has thousands of supporters and has fully engaged with the local plan for nearly six years and therefore would wish to participate on the relevant panel(s).</p> <p>Five Oak Green should be included here too.</p> <p>9(b) deals with heritage assets where SC is concerned with the text "...sympathetically integrated into the development...". The reference to "into" conflicts with the other policies which seek to mitigate the impact on the landscape and the setting of these important assets. STR/SS 1 should be clear with adequate policy in this area and consistent with Policy EN 5.</p> <p>Again, connections with Five Oak Green should be included. A safe crossing of the A228 is essential and should be referred to here.</p> <p>9(j) refers to "...compensatory improvements to the green belt" where the examination has discussed what these might be. SC remains unclear and users of the Plan need clarity of what constitutes such compensation. How would development proposals be judged without any guidance in policy? 9(J) should therefore set out clearly what the policy requires.</p>
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	<p>15 (e) the improvement of the highway network including:</p> <ul style="list-style-type: none"> <li>i) the Colts Hill Bypass and associated junction improvements at Badsell Roundabout</li> <li>ii) Somerhill Roundabout improvements</li> <li>iii) Hop Farm Roundabout improvements</li> <li>iv) Junctions on the Pembury Road corridor</li> </ul> <p>15 (f) subject to monitoring evidence collected in accordance with an agreed Monitor and Manage Framework the further improvement of the highway network through a series of junction improvements (as set out in the council's Infrastructure Delivery Plan) may be required at:</p> <ul style="list-style-type: none"> <li>i) A267/B2169 Birling Road</li> <li>ii) B2017/Hartlake Road</li> <li>iii) A228/Maidstone Road</li> </ul>	<p>SC notes the Council's approach of 'less is more' as suggested by the Inspector. However, this policy should align with STR6 and provide users with clear guidance of the highway improvements necessary.</p> <p>SC suggests the following additions to 15(e):</p> <ul style="list-style-type: none"> <li>v) <i>Five Oak green traffic management/speed reduction measures along B2017</i></li> <li>vi) <i>PW North West: internal link road between the A228 and B2160 Maidstone Road, roundabout access with A228, priority access with Maidstone Road</i></li> <li>vii) <i>PW South West: internal road off Badsell Road; access with A228, access with Badsell Road.</i></li> </ul> <p>SC notes the discussions at the hearings regarding the impact on Matfield Village (B2160) and considers this should added to the list of monitored/managed locations.</p>
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MM81	<p><b>Development Parcel Principle Uses and Development</b></p> <p><u>Policy STR/SS 1(A) – North Western Parcel Requirements:</u></p> <p>(i) approximately 770 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;</p> <p>(ii) land for a two-form entry primary school site, safeguarded to enable expansion to three form entry;</p> <p>(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;</p> <p>(iv) a local centre providing up to 700sqm commercial floorspace (Class E(a) to (f)) in total;</p> <p>(v) the safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required, unless it can be demonstrated that the school provision will be delivered through other ways as set out in this policy, whereby any alternative development of the safeguarded land will be subject to the consideration of policies in this plan, and the council's ambitions for comprehensive delivery of policy STR/SS 1;</p> <p>(vi) a Wetland Park within and to the north of the North-Western parcel to deliver flood water attenuation and new habitat, allowing for informal recreation via a network of footpaths and boardwalks;</p>	<p>Access to this greenfield development site is problematic. The A228 is a strategic highway with a 60mph speed limit and the existing farm tracks do not provide safe access, The IDP and DLA masterplanning (and our suggested changes to STR6 and 15 (e) above) specify a new roundabout on the A228 north of the railway line to access this parcel. It is essential that this is provided prior to any significant construction works are progressed.</p> <p>SC recommends that this policy makes this clear by adding the following clause:</p> <p><u>Ensure the provision of a new roundabout on the A228 to access parcel STR/SS 1(A) early in the construction phase</u></p> <p>SC notes that Crest Nicholson are proposing vehicular access to the gypsy/traveller site south of the railway directly from the A228. We consider that this additional access point would unnecessarily impact highway safety and the access to the site would be better through parcel STR/SS 1(B). See below.</p> <p>To make this clear SC suggests a revision to (iii) to add:</p> <p><u>Access to this site will be provided through parcel STR/SS 1(B).</u></p>
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	<p><u>Policy STR/SS 1(B) – South Western parcel Requirements:</u></p> <p>(i) approximately 520 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;</p> <p>(ii) a mix of housing to include sheltered accommodation provision in accordance with policy H6;</p> <p>(iii) a local centre providing up to 700sqm commercial floorspace (Class E(a) to (f)) in total including a Healthcare facility;</p> <p>(iv) a flood water attenuation area allowing for informal recreation via footpaths and boardwalks;</p> <p>(v) provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement.</p>	<p>SC also considers that the access to this site should be made clear in this policy by adding:</p> <p><u>Ensure the provision of access with the A228 to parcel STR/SS 1(B) early in the construction phase</u></p> <p><u>Ensure the provision of access with Badsell Road to parcel STR/SS 1(B) early in the construction phase</u></p>
MM84	<p>Section 5: The Strategy for Tudeley Village</p> <p>Delete heading, paragraphs 5.199 to 5.299, Map 31 – Site Layout Plan and Map 32 – Tudeley Village Plan</p>	<p>SC welcomes and fully supports the deletion of these policies in their entirety.</p>
MM85	<p>Policy STR/SS 3 The Strategy for Tudeley Village</p> <p>Delete Policy STR/SS 3, paragraph following Policy, Map 33 – Transport connections and Map 34 – Transport connections</p>	



MM91	<p>STR/CA1 Policy for Capel Parish</p> <p>4. Provide compensatory improvements to the Green Belt, including <del>measures to reduce flooding to particular areas of Five Oak Green</del></p>	<p>SC is extremely concerned that the “measures to reduce flooding in Five Oak Green” have been deleted. This is in the context of a more than doubling of the houses in Capel by development in SS1.</p> <p>SC notes that Five Oak Green Flood Alleviation Scheme (Alder Stream catchment) remains Critical, under Environment Agency review with natural flood management options.</p> <p>SC has set out under MM81 above that the compensatory improvements should be specified. We would welcome that being repeated here.</p> <p>Note that Five Oak Green is in pressing need of a new Community/Village Hall. Surely, there is a requirement to cater for existing residents to ensure they are not disadvantaged by the development within the parish.</p>
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ENDS...