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Dear Sir / Madam,

PROPOSED REGULATION DRAFT LOCAL PLAN CONSULTATION, TUNBRIDGE WELLS BOROUGH COUNCIL.

Introduction

This letter has been prepared on behalf of The Save Capel Campaign Group and Capel Parish Council (“The Group”). This group has been formed as a result of the strong concerns of local residents in the Capel area in relation to the proposals for the development at Tudeley, East Capel and Paddock Wood as proposed in Tunbridge Wells Borough Council’s Draft Local Plan, Regulation 18 Consultation Draft. This document proposes major growth at:

- Tudeley New Town (2,500-2,800 new homes)
- East Capel/Paddock Wood (4,000 + new homes, of which 1,400 + will be on land in East Capel)

The New Town at Tudeley and part of the development at Paddock Wood (the East Capel portion) are within the Parish of Capel and therefore will directly affect the residents of this area.

The Parish is currently made up of 950 homes and 2,500 residents. These proposals, if carried out, would thus increase the number of homes in the Parish **by 500%**. It is hard to overstate the significance of the impact which such an extraordinary level of growth would have. It would change the character of the area beyond recognition, impacting landscape, heritage, transport, flood risk, local ecology, Green Belt and immediately adjacent AONB.

Summary

The matters of significant concern to the Group are summarised as follows:

In principle objections:

1. Lack of prior consultation

The draft Local Plan presents a level of growth in Capel which has never been the subject of public consultation. This is unacceptable for a proposal for a new town which would triple the number of homes in the Parish. It is not appropriate for the first public consultation on it to take place at the Regulation 18 stage.

2. Approach to housing needs

- The level of housing growth planned for is not necessary; TWBC has based its housing need calculation on out of date (2014 Household projection) figures. The Group believes that using the latest Office of National Statistics figures (2016 figures, released May 2019) will result in a significant reduction in objectively assessed need.
- Notwithstanding the above, in the context of the NPPF TWBC is **not obliged** to plan for the full objectively assessed housing need given the constraints within the Borough created by the sheer volume of AONB/Green Belt land. The growth strategy which is proposed, which results in significant loss of Green Belt land, is not therefore compulsory under the NPPF.

3. **Lack of infrastructure planning**

New infrastructure is going to be a critical element of the proposed development, particularly in relation to Tudeley New Town. The draft Infrastructure Delivery Plan to support these proposals has not been prepared yet. This draft Plan cannot sensibly be sent for Regulation 18 consultation without this supporting evidence.

4. **Failure to co-operate**

There is no evidence before you that the duty to co-operate with neighbouring authorities has been fulfilled.

Detailed objections:

5. If the development outlined in the draft Local Plan for Capel Parish was to go ahead, it would have significant consequences in terms of:

- Traffic, including road and rail access.
- Impact on the Green Belt.
- The character of the area, including historic buildings such as Tudeley Church (Grade I Listed).
- Landscape and visual impact, including impact on the adjacent High Weald National Character Area (AONB).
- Flooding.

6. The delivery of these sites (particularly at Tudeley New Town) are uncertain within the Plan period.

It is understood that this Consultation Draft Plan is being put before the Planning and Transport Cabinet Advisory Board on the 5th August 2019 for consideration as to whether this draft Plan should be put forward for public consultation from the 20th September to 1st November 2019. It is the strong opinion of this Group that this Plan in its current form is **not acceptable for consultation** and it is therefore urged that the Planning and Transport Cabinet Advisory Board chooses Option 2 as presented:

“Do not undertake “Regulation 18” consultation on the Draft Local Plan and Sustainability Appraisal (supported by Infrastructure Delivery Plan, Equalities Impact Assessment and other documentation) at this time.”

The consequences of delay

Before turning to these points, the Group notes that the report states that a delay in delivery will create risks (in terms of creating a presumption in favour of sustainable development; the so-called “tilted balance”). This is overstated, as explained below: even under the tilted balance planning applications can be refused if AONB/Green Belt policies provide a clear reason for doing so¹. But in any event, it is the clear view of the Group that the risk of proceeding with this Plan (in terms of the impact of the proposed future growth) would be more harmful to the Parish of Capel than a delay to undertake a new assessment of options for growth in this area.

Vision

The Vision set out in the draft Local Plan states that, in 2036:

- *“Paddock Wood as a settlement will have developed considerably (including on land in eastern Capel parish) on the basis of garden settlement principles, using a comprehensive, masterplanned approach. This will have provided a vibrant and regenerated town centre, together with enhanced employment, leisure, and other facilities, the delivery of significant and strategically planned infrastructure, to include active travel connections to the new garden settlement at Tudeley Village, Royal Tunbridge Wells and Southborough, and Tonbridge, and reducing (existing) flood risk to areas of Paddock Wood, Capel parish, and Five Oak Green; i.e. resulting in 'betterment' for these areas;*
- *A new garden settlement will have been established at Tudeley Village, including homes, employment, and community facilities: this will continue to develop into the following years. It will be well connected to other settlements, be an exemplar development in design, sustainability, and active travel, and will contribute to strategically planned infrastructure, including reducing (existing) flood risk to areas of Five Oak Green; i.e. resulting in 'betterment' for these areas.”*

This intent is set out in Policy STR1, which states that there will be:

¹ NPPF para 11(d)(i).

1. "Expansion at the settlement of Paddock Wood (including land in the eastern part of Capel parish) following garden settlement principles to deliver housing and employment growth, new and expanded education facilities, and provide strategic flood risk solutions to reduce flood risk and provide betterment to particular existing areas. Regeneration of the town centre to provide a vibrant and viable new centre for the communities it will serve, as well as the delivery of a range of other community facilities and infrastructure, including new health facilities, a sports hub, new primary schools, expansion of the existing secondary school, and potentially the off-line A228 (i.e. the Colts Hill by-pass);
2. A new garden settlement at Tudeley Village of 2,500-2,800 houses, to deliver approximately 1,900 new homes during this plan period, as well as a package of infrastructure measures, including new education facilities to serve the settlement itself and the wider catchment area, and strategic flood risk solutions to reduce existing flood risk and provide betterment to particular areas;"

The Group **significantly objects** to:

- The proposed vision,
- The provisions of policy STR1, and
- Subsequent policies: STR/PW1, AL/PW1, AL/PW2, AL/PW3, AL/PW4 in relation to Paddock Wood and STR/CA1, AL/CA1, AL/CA2, AL/CA3 in relation to Land at Capel, including Tudeley New Town.

The Group will set out their detailed objection to these policies and other areas of the Plan as relevant as and when it progresses to formal consultation. However, there are strong reasons that the Plan **should not be consulted upon in its current form**. These relate not only to the extent and location of growth proposed, but also to the consultation process which has been undertaken to date.

Points of principle

Process

The document presented to you is stated to have "been prepared following consultation on a document which looked at the Issues and Options facing the borough" (Paragraph 1.2; Purpose of Report and Executive Summary). It identifies that "The Local Plan Issues and Options document was published in summer 2017, for public consultation. This set out the main issues facing the borough, with reference to seven themes, and sought early views about the best way to approach the specific challenges presented by each theme. Most importantly, it proposed five possible spatial options for the physical location of new development across the borough to meet identified needs that would meet the challenges to different degrees, and in different ways." (Paragraph 2.8)

What the document does not explain, however, is that although the 2017 Issues and Options paper did propose growth at Paddock Wood and potentially East Capel, it did not present the option of significant growth via a new town at Tudeley.

Five options for growth were presented in the 2017 Issues and Options consultation document. These were:

- **Option 1:** Focussed growth (and it is noted that this included growth around Paddock Wood but assumed limited growth in the rural areas and smaller villages).
- **Option 2:** Semi Dispersed Growth, which again included growth at Paddock Wood and Five Oak Green to the west.
- **Option 3:** Dispersed Growth, across all settlements.
- **Option 4:** Growth Corridor led approach.
- **Option 5:** Garden Village Settlement – This option did not propose any location for this growth.

So although it is true that the Issues and Options Plan included (in Option 5) a possible option being growth by means of a "Garden Village Settlement" somewhere, the option of growth by such a new town at Tudeley was not included and has never been formally consulted upon. In this context, the responses to earlier consultation **do not and cannot** reflect the weight of objection by local people to this proposal as now set out in the Consultation Draft Plan.

It is of course true that the Plan has evolved since the 2017 Issues and Options version. But paragraph 2.9 of the document before you states that "This has involved reviewing the comments received as part of the Issues and Options consultation, liaison and engagement with Parish and Town Councils, Neighbourhood Plan Groups, the Town Forum, discussions with infrastructure providers, consultees, neighbouring authorities and Kent County Council, consideration of the findings of the evidence base and a review of different approaches to planning policies taken by authorities across the country."

Not only is this inaccurate in terms of the response to Issues and Options (as identified above), but the reference to “*liaison and engagement with Parish and Town Councils, [and] Neighbourhood Plan Groups*” is also inapt, given that neither Capel Parish Council nor local residents have been given any opportunity to comment formally on the Tudeley New Town.

Since the 2017 Issues and Options consultation the relevant chronology is as follows:

Date	Events
13.03.18	Presentation by TWBC to Parish Chairs. This did not raise the possibility of a New Town in Capel; instead it proposed 440 new homes in Five Oak Green. Three potential “garden village” sites were shortlisted for feasibility studies ... Tudeley was not one of them.
20.04.18	Meeting with TWBC to discuss housing allocations. The possibility of Tudeley New Town was first raised.
16.08.18	Meeting between Capel Parish Council and TWBC, at which TWBC sought written confidentiality obligations. A brochure entitled “Hadlow Garden Village”, prepared by the landowner, was provided.
19.05.19	At Capel Parish Council’s insistence, TWBC announced in public <u>for the first time</u> the intention to develop: <ul style="list-style-type: none"> • 2,500 - 2,800 homes on site CA1 (Tudeley) • 4,000 homes around Paddock Wood, including 1,400+ in East Capel

None of these events have been in a timescale or format which has allowed for formulation and provision of a formal response.

It is not a proper process for the first consultation with the residents of Capel Parish on such a significant change to their local area and communities to take place via examination of a draft local Plan under Regulation 18. There should be prior local consultation before the draft Local Plan is prepared. For that reason alone, the Committee is invited to decline to send this draft Plan to Regulation 18 consultation.

Housing need

The draft Plan seems to have been driven by two factors:

- first a calculation that using the standard method, the Borough’s housing development needs are for 13,560 homes over the Plan period (2016-2036; 678 homes per annum)²; and
- an assumption that this target must be met.

Baseline figures used for calculations

A critical element in the standard method for objectively assessing housing needs is projected population growth. The Office of National Statistics released new population data on 16 May 2019; this shows that population growth projections for the Borough are reducing. It follows that when these data feed through into the CLG household projections for the Borough, they will drop.

² Based on completions and permissions, this means that the Draft Local Plan needs to allocate sufficient land for 7,639 houses, plus a buffer. The Consultation Draft Local Plan provides for some 14,776 net additional dwellings, as compared to the minimum requirement of 13,560 dwellings. This provides an oversupply (essentially the “buffer”) equivalent to 9%.

The Group has not, in the time available, been able to prepare its own calculations and produce a figure for the number of homes which will be produced by using the up to date data. This is a notoriously complex area. What it can say with confidence, however, is (a) that TWBC has not used the latest figures available in their calculations and (b) that the new figures will show a lower objectively assessed need than 13,560 homes.

No obligation to meet the target in any event

We accept that TWBC faces a challenge in delivering this level of growth, because of the sheer volume of land designated as Green Belt (20%) and AONB (70%) in the Borough. However, TWBC seems to have proceeded on the basis that it has no choice about meeting the objectively assessed need, and has therefore decided to meet it by sacrificing large amounts of Green Belt land.

This approach fails to take account of the clear provisions of the NPPF. At paragraph 11(b), specifically in relation to plan-making, the NPPF provides as follows:

*“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area [footnote 6]; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*

Footnote 6 then states

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, [or] an Area of Outstanding Natural Beauty ...”

The designation of land as Green Belt can therefore be a strong reason for restricting the overall scale, type or distribution of development planned for in the Development Plan. In the context of the NPPF, paragraph 11(b) and footnote 6 together allow a Local Planning Authority not to meet its full objectively assessed housing need, if the only way of meeting it is to build on Green Belt land.

In other words, sacrificing Green Belt to build houses is not something which is being forced upon TWBC. It is something which TWBC appears to be choosing to do.

The fact that TWBC’s planning department appears to appreciate that it has a choice in the matter appears from Appendix E of the Consultation documents (the Sustainability Appraisal), paragraph 6.1.8. This states as follows:

“Consideration was also given to a further option: growth that only partially meets identified needs. However, the iterative process through which sites were selected for development potential, including through the SA of sites, indicate that there is capacity in the Borough to meet housing targets whilst still having due regard to AONB and Green Belt policies. Therefore, this option is not considered to be a reasonable alternative in the context of the NPPF at this point.”

It is unclear as to how the extent of development proposed on Green Belt land, particularly around Tudeley and Paddock Wood, which amounts to around 600 acres, can possibly have been deemed to be ‘having due regard to AONB and Green Belt policies’ in the context of NPPF paragraph 11 and Chapter 13, which emphasises the protection of the Green Belt.

In summary, therefore:

1. the Plan has not taken account of the latest population growth data; when it does so, it is likely that the Borough does not need the scale of growth for which this Plan provides; and
2. the formulation of this Plan has not given adequate weight to the impact of development on the Green Belt and its protection in the context of Paragraph 11 of the NPPF.

Lack of infrastructure planning

The draft Plan identifies, that the development needs to be supported by the timely delivery of infrastructure to support growth on this scale. This will be set out in a Draft Infrastructure Delivery Plan – but it is not yet ready. It will only become available later, as one of the documents to support the Draft Local Plan during the public consultation.

The Committee should take heed of this significant gap in the evidence before it. The Infrastructure Plan is critical, but is not available. It is not appropriate to send this draft Plan for Regulation 18 consultation in this context.

As things stand, there is insufficient evidence in relation to the extent and nature of infrastructure needed to support the growth proposed and the way in which this can be delivered in a timely manner to support growth in this location. The proposed Tudeley New Town has no rail link, no bus link and only country roads and one B road as road links. Without massive infrastructure investment it will be wholly dependent on private car use; this is likely to be true even after investment, given that Network Rail has already clearly indicated that it will not consider building a new station between Paddock Wood and Tonbridge.

Furthermore, although the Vision and policy STR1 refer to the achievement of ‘betterment’ to these areas, the Plan provides no real detail of what this will be and how it will outweigh the harm to the Green Belt and any other harm.

Failure to Cooperate

NPPF paragraphs 26 and 27 state as follows:

“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.”

In terms of this Duty to Cooperate, however, all that the document before you states is that *“The strategic sites at Capel and Paddock Wood and Tudeley are in relatively close proximity to the borough boundaries. Both TMBC and MBC are fully aware of these proposals, and discussions have taken place about the cross boundary implications of these proposals.”*

Being “aware of” these proposals is a very long way from what is required under the NPPF. The evidence supporting this Plan does not state that these proposals at Paddock Wood and Tudeley are supported by these neighbouring authorities (which the Group understands is not the case) or that there is agreement as to the extent of reliance on infrastructure outside of the Borough (such as transport, schools, doctors etc.).

The consultation draft Plan does not therefore demonstrate that it has adequately met the clear requirements of the NPPF. It should not be sent for consultation until this has been rectified.

Detailed Matters

The delivery of development is not supported in the Parish of Capel and specifically, at the sites at Tudeley New Town, East Capel and Paddock Wood for the following summarised reasons.

1. Impact on the Green Belt.

We have already set out the ‘in principle’ reasons that TWBC does not need to deliver this extent of development in the Green Belt. In addition, however:

- The development will be contrary to the aims of the Green Belt, for example in terms of urban sprawl and coalescence of settlements. It will result in the development of highly valued countryside and the erosion of this buffer between settlements.

- The development will be widely visible from the surrounding countryside and landscape and from existing residential areas and heritage assets in Capel. It will be visually prominent and urbanise this attractive rural area.

TWBC engaged Land Use Consultants Ltd in 2016 and 2017 to carry out an assessment of the extent to which various parcels of the Green Belt land within the Borough served the first four of these five purposes.³ Since “Broad Areas” BA3 and BA4 (as defined by Land Use Consultants Ltd) are respectively defined as land south and north of the main railway, Site 454 lies in Broad Area BA3 and Site 447 lies in Broad Area BA4.

The conclusions of the assessment were summarised in Table 6.1 of the Stage 2 report as follows:⁴

Area	Purpose (a)	Purpose (b)	Purpose (c)	Purpose (d)	Overall Harm Rating
BA3	Strong	Strong	Strong	Weak or no contribution	Very high
BA4	Relatively weak	Strong	Strong	Relatively weak	Very high

So TWBC’s own assessment of the “broad areas” in which all the Capel Parish sites lie is that there is a very strong case against allowing any land within them to be withdrawn from the Green Belt.

These proposals are clearly contrary to Chapter 13 of the NPPF. We expected, therefore, to find TWBC’s justification for them clearly explained in the draft Plan. Instead we find this (paragraph 4.50):

“The evidence and justification to release land from the Green Belt and the decision to not designate additional areas as Green Belt are explained in more detail in the Distribution of Development Topic Paper available on the Council’s website, which draws on the findings of the Green Belt Strategy Study (Part 1) and subsequent Green Belt Study (Part 2)(22). In particular, this addresses paragraphs 136-139 of the NPPF (2019).”

On being asked for the Distribution of Development Topic paper, however, TWBC’s Principal Planning Policy Officer has replied saying that it will be available from the commencement of the Regulation 18 public consultation.

TWBC is asking this Committee to send for consultation a draft Plan which is substantially based upon a proposal to urbanise 600 acres of Green Belt. The “evidence and justification to release land from the Green Belt” could hardly be more important, therefore. But it has not even been prepared. It is not before the Committee. The Committee thus has no basis at all on which to assess whether the reasons are good, bad or indifferent. The evidence must be made available to justify this approach before it is progressed to Regulation 18 consultation.

Finally, the Plan does not explain what ‘compensatory measures’ will be sought to meet the requirements of Planning Guidance as published on the 22nd July 2019. No such measures, however, can adequately compensate future generations for the destruction of 600 acres of virgin land. This urbanisation cannot be undone.

³ Tunbridge Wells Green Belt Study, Stage Two Final Report prepared by LUC July 2017. See paragraph 5.2, “Assessment Principles”, for an explanation of why the fifth purpose (urban regeneration) was not assessed.

⁴ The “purposes” are those recorded in para 134 of the NPPF: “Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.

2. The character of the area.

This area benefits from strong character and historic interest, which will be affected by the proposed development at Paddock Wood and Tudeley New Town.

The NPPF states *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”*. (Paragraph 194, NPPF)

In domestic planning applications, TWBC requires an assessment of the impact of the proposed development on all heritage assets within a kilometre. Applying its own metric to its own development proposals shows the following approximate numbers of heritage assets in, or within a kilometre of, the proposed Capel development sites:

- CA1 (Tudeley New Town)
 - Grade I 2
 - Grade II* 1
 - Grade II 70

- East Capel
 - Grade I 0
 - Grade II* 1
 - Grade II 45

- Sites 447/454 (the school sites on the edge of Tonbridge)
 - Grade I 0
 - Grade II* 2
 - Grade II 20

In addition, there are 2 Grade II listed Historic Parks & Gardens and numerous historic farmsteads (although these are not listed, in numerous domestic planning applications TWBC seeks to preserve them by following a similar methodology to that which protects listed buildings).

Tudeley is particularly sensitive in terms of heritage around Tudeley Church, which is a Grade I listed building and the only church in the world with all its windows designed by Marc Chagall. Significant consideration needs to be given to the heritage and conservation impact of the development proposed in this area on the setting of this unique global heritage asset.

In addition, TWBC’s own Historic Environment Review (2018) states that *“The historic character of the Low Weald is particularly vulnerable to poorly managed development at the urban fringe, especially around Paddock Wood and Five Oak Green”*. This is of particular concern in relation to the development proposed in Capel Parish and whether the harm of it has been adequately considered and evidence to justify it prepared.

3. Landscape

Sites CA1 and 447/454 lie adjacent to the High Weald AONB and predominantly within the High Weald National Character Area. This is a statutory designation of national importance and receives particular protection under the NPPF. See paragraph 172:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The scale and extent of development within these designated areas should be limited.”

The High Weald AONB Management Plan applies to the setting of the AONB itself – *“especially where the setting falls within the High Weald National Character Area”*.⁵

The development proposed will irreversibly impact the landscape and character of this area and the need to do so has not been adequately considered.

⁵ High Weald AONB Management Plan, p14.

4. Transport

We accept that the East Capel sites are well-served by transport infrastructure; as the Issues and Options document (2017) noted, “*Paddock Wood benefits from good transport links and higher-order facilities, such as a secondary school and sports centre*” (paragraph 2.6)

The Tudeley New Town sites, however, are a completely different matter. They have no bus links, let alone train links. There is no prospect whatever of Network Rail inserting an extra station between Tonbridge and Paddock Wood, the journey time for which is currently only 6 minutes. No evidence has been presented to suggest the contrary.

The development of both Tudeley New Town and Sites 447/454 will thus inevitably have a substantial impact on the road network in this area. The inhabitants of Tudeley New Town will have no option but to travel by car, and schools notoriously generate traffic.

The very substantial proposed increase in the size and population of Paddock Wood will also inevitably impact the road network.

All of this will need detailed consideration to ensure that the proposed growth can be suitably accommodated, and relevant infrastructure improvements delivered in a timely manner to support the proposed development. There is no evidence at all before this Committee to show that this is feasible or deliverable.

5. Flooding

East Capel

The NPPF states that Plans need to “*take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk*” (NPPF paragraph 149).

Despite these obligations, the draft Local Plan proposes to develop a large block of land between the A228 and the western edge of Paddock Wood. Almost all of this land lies in the Environment Agency’s Flood Zone 3. (Only 7% of the Borough lies within this designation, therefore it seems that there is a significant area with a lower flood risk which would more sustainably have been considered for growth.) There is a reason for the current western boundary of Paddock Wood stopping where it does stop: that is the edge of the flood plain.

Tudeley New Town

The area proposed for development in this area lies on a heavy clay marl which absorbs little rainwater and drains downhill towards the railway to the north; developing it will require extensive mitigation measures.

Further, some areas around the proposed Tudeley New Town are known to flood. The policies proposed identify the need for flood improvement measures as part of the proposals for this area, but further detail on the extent of flood risk and mitigation measures which will need to be undertaken to achieve the necessary improvements should be provided as part of this consultation to support the soundness of the Plan.

6. Delivery

In terms of delivery, the site at Tudeley is in one ownership, with the landowner publicly stating that he will retain control of masterplanning. There is thus currently no detail at all as to how it will be delivered. The extent of development in this one location and indeed, combined with Paddock Wood, in this area, represents a significant risk in terms of delivery and the Council’s strategy for growth within the assumed timeframes.

The site proposed for Tudeley New Town is currently under consideration as part of the Kent Minerals Plan and it is unclear how this relates to the timescales for delivery of this site for housing.

7. Other matters

There are other areas of significant concern, relating to:

- The severe and negative impact on wildlife habitats in the area, as a result of the known existence of protected species in the area.
- Resulting air, light and noise pollution in the areas.
- Loss of much needed high-grade agricultural land.

These matters will be covered in the response to Regulation 18 Consultation at the appropriate time.

Finally, we were yesterday informed by TWBC that no Distribution of Development topic paper yet been prepared. The Committee is thus being asked to recommend a draft plan when much of the critical supporting evidence is missing.

Conclusion

In the light of both the strategic and more detailed points developed above, it is apparent that this draft Plan is not yet sufficiently sound to be considered under Regulation 18 consultation.

We therefore urge you to take the approach of Option 2, so that further consideration can be given to the impact of the location and extent of growth around Capel before the draft Plan is progressed to the Regulation 18 public consultation stage.

We look forward to your consideration of the enclosed and should you have any queries, please do not hesitate to contact me.

Yours faithfully,

Julia Riddle MRTPI

DIRECTOR, CASTLE PLANNING