OBJECTION TO PLANNING APPLICATION - FINCHES FARM, CAPEL

REF: 25/00513/OUT

To: Planning Department, Tunbridge Wells Borough Council

Save Capel objects to the proposed development of approximately 130 dwellings at Finches Farm on the following principal grounds:

1. Flood Risk - Sequential Test

- The site has significant flood-risk constraints, making the NPPF Sequential Test a critical consideration.
- NPPF paragraph 174 states that development should not be permitted where there are reasonably available sites appropriate for the development in areas with a lower risk of flooding.
- The officer report states "The Sequential Test identified two nearby sites (to the South of the B2017 and to the west of the school) which had been submitted in the Council's SHEELA"
- The officer consequently concluded that the Sequential Test was not passed.
- These sites can be identified as 450 & 451 (200 dwelling yield) and 451(153 dwelling yield)
- That makes the Sequential Test issue significant: the Council's own evidence identifies potential alternative land parcels in the immediate Five Oak Green area with substantially more theoretical housing capacity than the 130 homes now proposed, while the officer report also expressly accepts that the alternatives are lower flood-risk locations.
- The Council should therefore require the applicant to demonstrate convincingly why these alternatives cannot reasonably accommodate the proposed development.
- Flood mitigation measures may reduce risk to the proposed houses, but do not in themselves demonstrate that the site satisfies the Sequential Test.

2. Landscape and Settlement Character

- A development of approximately 130 homes would represent a substantial expansion of Capel/Five Oak Green.
- New housing, roads, lighting and associated infrastructure would materially urbanise the existing rural landscape and alter the character and setting of the settlement.
- The cumulative impact should be considered alongside other planned development in the wider Capel/Paddock Wood area.

3. Highway and Infrastructure Capacity

- There are concerns about the ability of the local highway network to accommodate additional traffic safely, particularly around Five Oak Green and Capel Primary School.
- The Council should require robust evidence on traffic, pedestrian safety and school-time congestion.
- There should also be clear evidence that education, drainage, wastewater, potable water and other infrastructure has sufficient capacity, with necessary improvements capable of being delivered in a timely manner.

4. Scale and Location

- The scale of the proposal is substantial in the context of this rural settlement.
- Given the combination of flood risk, landscape impact and infrastructure pressures, the justification for locating this level of development specifically at Finches Farm has not been demonstrated.

Conclusion

The combination of flood-risk constraints, the apparent availability of lower-risk alternative sites, landscape and settlement impacts, and infrastructure and highway concerns weighs strongly against the proposal.

Save Capel therefore respectfully request that Tunbridge Wells Borough Council refuse the application, or, at minimum, require the applicant to provide compelling further evidence addressing these matters before any decision is made.

Yours faithfully,
Save Capel